



LAW BRANCH  
THE ARMY LIST

# REPORT TO THE CONGRESS



## Need To Improve The Management Of The Detailing Of Civilians Employed At Military Installations

B - 160879

Department of Defense

*BY THE COMPTROLLER GENERAL  
OF THE UNITED STATES*

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NOV. 15, 1966



COMPTROLLER GENERAL OF THE UNITED STATES  
WASHINGTON, D.C. 20548

B-160879

To the President of the Senate and the  
Speaker of the House of Representatives

This is our report on the need to improve **the** management of the detailing of civilians **employed** at military installations of the Department of Defense.

Copies of this report are **being** sent to the Director, Bureau of the Budget; the Secretary of Defense; the Secretaries of the Army, **Navy, and Air Force**; the Director, Defense Supply **Agency**; and the Chairman, United States Civil Service Commission.

A handwritten signature in black ink that reads "Thomas B. Akers".

Comptroller **General**  
of the United States

D I G E S T

WHY THE REVIEW WAS MADE

In a review for Congressman John E. Moss, California, the General Accounting Office (GAO) looked into statements of a constituent concerning the practices of McClellan Air Force Base officials in temporarily assigning civilian employees to work on other than their regular jobs. This practice is known as detailing.

GAO's findings led to this expanded review at 10 industrial-type military installations in California, Georgia, Texas, Utah, New Jersey, and New Hampshire.

FINDINGS AND CONCLUSIONS

The basis law (5 U.S.C. 38 (now section 3341)) provides that the head of an executive department or a military department may detail employees among the bureaus and offices of his department, except employees who are required by law to be exclusively engaged on some specific work.

Details in excess of 30 days are required to be recorded as personnel actions and the records maintained permanently in the agency's official personnel Polders. GAO found:

- Many instances of failure to record details, and many details improperly recorded. (See p. 8.)
- Many instances where large numbers of employees were being "loaned" or "borrowed" between shops without appropriate personnel action to credit the individuals for the time involved. (See p. 8.)

Since extended details conflict with the principles of proper job evaluation, the Civil Service Commission (CSC) required that details in excess of 6 months (now 120 days) be approved by the local CSC office.

GAO found many instances in which details in excess of 6 months had not been approved by the CSC, as required. (See p. 10.)

- At one installation, GAO found 18 instances in which employees were detailed to duties that had not been classified as to grade for periods in excess of 6 months. (See p. 11.)

Tear Sheet

NOV. 15, 1960

--At another installation, apparently to eliminate the need for getting CSC approval, details were being broken just prior to the expiration of the 6-month periods by returning the employees to their official duties for a few days and then detailing them again for another 6-month period. (See p. 11.)

This report also contains GAO's comments on the practice of detailing employees to higher grade positions (p. 12), using temporary promotions to fill vacancies (p. 12), and detailing employees to lower grade positions. (See p. 13.)

Finally, little evidence was found that internal audit or review staffs of the services or CSC inspection teams had found the types of deficiencies at the military installations that GAO found or that, if they did, they had identified the causes and made meaningful recommendations for remedial action. (See p. 14.)

#### RECOMMENDATIONS OR SUGGESTIONS

GAO suggested that:

- The Secretary of Defense direct civilian personnel offices to increase their surveillance at the employee/supervisor level and ensure that proper controls are observed.
- The Secretary of Defense direct military internal audit and review groups to increase the attention which they have been giving to this area.
- The Chairman of CSC direct his inspection teams to increase their surveillance of these matters.

#### AGENCY ACTIONS

The Secretary of Defense and the Chairman, CSC, agreed in general with GAO's suggestions and outlined corrective actions which they were planning to take. (See p. 16.)

#### ISSUES FOR FURTHER CONSIDERATION

None.

GAO is requesting the Secretary of Defense and the Chairman, CSC, to keep it advised of the results of the corrective actions.

#### LEGISLATIVE PROPOSALS

None.

Congressman Moss on June 27, 1967, introduced a bill (H.R. 11184) to correct certain inequities with respect to the details of civilian employees of executive agencies, which was referred to the Committee on Post Office and Civil Service, House of Representatives.

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July 15, 1968, to the General Account-  
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## INTRODUCTION

The General Accounting Office has made a limited review of **the** policies and practices of the Department of Defense as they relate to the detailing of civilian employees of field activities. Detailing, **or** the practice of temporarily assigning employees to work on other than their regular jobs, is intended only for meeting temporary needs of work programs when necessary services cannot be obtained by other desirable or practicable means. Our review was made primarily to **determine** whether civilian personnel officials were maintaining adequate controls over the detailing of civilian employees to the extent that official records of details were being kept in accordance with applicable regulations and that the employee **was** receiving credit for additional experience he may have gained by reason of having been on detail.

This review was made at 10 industrial-type military installations employing about 118,000 civilian employees in both General Schedule (GS) and Wage Board positions. Because of improper recording practices and, in many cases, failure to make any record of details, we did not attempt to establish how many of the 118,000 employees had been improperly detailed or had not been given proper credit for experience gained while on detail. Moreover, since the review was directed primarily to the recording of details and related experience gained, the conditions discussed in this report should not be considered indicative of the effectiveness with which the civilian personnel offices were carrying out their many other functions.

A list of the principal officials of the Department of Defense responsible for the administration of the activities discussed in this report is included as appendix I.

This review, for which fieldwork was completed in February 1968, was made pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67). The scope of our review is described on page 19.

## BACKGROUND

The basic law (5 U.S.C. 38 (now section 3341)) provides that the head of an executive department or military department may detail employees among the bureaus and offices of his department, except employees who are required by law to be exclusively engaged on some specific work. Details may be made only by written order of the head of the department and may be **made** for not more than 120 days. These details may be renewed by written order of the head of the department, in each particular case, for periods not exceeding 120 days.

Pursuant to authority vested in the President of the United States, he has by Executive Orders set forth certain responsibilities of the Civil Service Commission for personnel administration in the executive branch of the Government. The Federal Personnel Manual is CSC's official publication containing instructions to other agencies of the United States Government on matters of personnel management.

Executive Order 9830, February 24, 1947, as amended, provides that the head of each agency, in accordance with applicable statutes, Executive Orders, and rules, shall be responsible for personnel management in his agency. To assist and advise him in carrying out this responsibility, he shall maintain or establish such office or division of personnel as may be required. He shall designate a director of personnel or other similarly responsible official to be in charge of such office or division. Such director or other official shall represent the head of the agency in personnel matters, subject to his instructions.

CSC's Federal Personnel Manual (FPM) defines a "detail" as the temporary assignment of an employee to a different position for a specified period, with the employee returning to his regular duties at the end of the detail. Technically, a position is not "filled" by a detail, as the employee continues to be the incumbent and receive the pay of the position from which he was detailed.

The FPM provides that details are intended only for meeting temporary needs of the agency's **work** program when necessary services cannot be obtained by other desirable or

practicable means. Details may be made appropriately to meet emergencies occasioned by abnormal workload, changes in mission or organization, or unanticipated absences. They may also be used pending official assignment, pending description and classification of new position, pending security clearance, and for training purposes, particularly where such training is a part of established promotional or developmental programs.

Agencies are responsible for keeping details within the shortest practicable time limits, and for making a continuing effort to secure necessary services through use of appropriate personnel actions. Agencies are further responsible for advising supervisors of the conditions under which details may properly be made, for controlling the duration of details, and for ensuring that such details do not compromise the open competitive principle of the merit system or the principles of job evaluation.

Detailing employees to other kinds of positions or to other examining jurisdictions immediately after competitive appointment, tends to compromise the competitive principle, and so it is not permitted. Except for an emergency detail of 30 days or less, an employee may not be detailed for at least **3** months after appointment from the register. Since extended details also conflict with the principles of job evaluation, details will be confined to a maximum period of **6** months unless prior approval of the **CSC** is secured.<sup>1</sup>

Details in excess of 30 days are required to be reported on Standard Form 52, Request For Personnel Action, or other standard form considered appropriate by the agency, and these forms are maintained as permanent records in the agency's official personnel folders. However, the preparation of such a report is not required for the detail of a career or career-conditional employee who is being assigned to perform duties of a position which is either an identical additional position or a position of the same grade, series code, and basic duties as the position to which he is regularly assigned.

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<sup>1</sup>See note on p. 6.

When it is found that a detail will exceed 6 months<sup>1</sup> or where there is a question as to the propriety of a detail, the agency must request prior approval by directing Standard Form 59, Request For Approval of Noncompetitive Action, to the CSC office which exercises certification and recruiting jurisdiction for the position in question.

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<sup>1</sup>The CSC by Bulletin No. 335-7 dated August 5, 1968, announced significant changes in the FPM effective September 1, 1968, and reduced from 6 months to 120 days the maximum duration of a detail without prior CSC approval. The new limitation on the duration of details imposed by CSC will thus coincide with the period of detail authorized by 5 U.S.C. 3341, so that there should no longer be any possibility for misinterpretation. (See app. III.)

## FINDINGS

### NEED FOR BETTER MANAGEMENT CONTROLS OVER THE DETAILING OF EMPLOYEES

On the basis of our review, we believe that the military departments can substantially improve the management of their civilian employees and assure them more equitable treatment if better controls over the detailing of employees are established at the installation level.

We found that civilian personnel offices, generally, did not have control procedures to ensure the proper recording of details. The failure of shop supervisors and operating officials to properly discharge their responsibilities, combined with the inadequate surveillance by personnel offices of proper detailing procedures and recordkeeping, have resulted in extensive violations of CSC and Department regulations that have been issued to protect the interests of employees serving on such details.

In numerous instances, employees were being detailed in excess of 30 days and no record of the details had been prepared; in others, employees were on details for periods in excess of 6 months without CSC approval. Similarly, some temporary limited, career-conditional, and career employees were being detailed under circumstances prohibited by regulations.

We believe that opportunities exist for considerable improvement in the management of personnel details to higher grade positions, lower grade positions, and positions or duties that have not been classified as to grade level 1.

There was little indication at the locations we visited that either the internal audit agencies of the military departments or the CSC had reviewed in depth the extensive detailing operations being carried on during the periods considered in our review. (See p. 19.)

Inadequate recording of details  
in excess of 30 days

At most of the installations we visited, we found numerous instances of details not recorded and of details improperly recorded. One of the primary reasons for requiring the recording of details in the employee's personnel folder is to maintain a record of the additional experience gained by performing duties different from his regularly assigned duties. This type of information is of utmost importance for the proper operation of any well planned merit promotion system.

Generally, it is the responsibility of the employee's supervisor to maintain adequate shop records and to initiate the personnel action forms required to be sent to the civilian personnel office incident to the beginning and termination of a detail exceeding 30 days. Failure by supervisors to maintain adequate records had the following results.

1. No personnel action form had been initiated; thus, no official record was made of the detail and the additional experience gained.
2. Personnel action form had been initiated but no termination action had been processed; thus credit was being continued for experience not actually gained.
3. Erroneous dates had been used in personnel action forms to show the beginning and/or termination of the details. This may have resulted in overcrediting or undercrediting the individuals for the experience.

Employees in a "loaned" or "borrowed" status

We found, by examining records maintained for cost accounting purposes, that large numbers of employees were generally being "loaned" or "borrowed" between shops and cost centers on a day-to-day and/or week-to-week basis, for extended periods in excess of 30 days. The lending and borrowing of employees is a generally accepted procedure to temporarily use employees who might otherwise be idle

By way of illustration, at one installation the acting civilian personnel officer called our attention to CSC instructions stating that temporary limited employees are ineligible for movement between positions and therefore cannot be properly detailed. He said that for this reason the absence of evidence of detail in the employee's personnel record was to his best interests. He also stated that, if the detail of a temporary-appointment employee was documented, the CSC inspectors could require the installation to discharge the employee. He pointed out, however, that the installation recognized and credited experience gained during such details if the employee claimed the experience by submitting Standard Form 58 after he had been converted to a career status for at least 90 days.

Details in excess of 6 months  
without CSC approval

Our review revealed many details which exceeded 6 months and had not been approved by CSC but which were a matter of record. Conversely, many details of more than 6 months' duration were not recorded in the employees' personnel folders because their supervisors had not initiated the necessary forms. Several of these details were for periods from 1-1/2 to 2 years in duration. While the personnel offices at some installations appeared to be making an effort to secure CSC approval, as required, others seemed to consider it as additional, nonessential paper work and made little or no effort to comply with the regulations.

Details to duties or positions  
that had not been classified

The Federal Personnel Manual states that details of employees to duties or positions that have not been classified under the position classification system are permitted under certain circumstances but that such details over extended periods conflict with the principles of position classification. These principles are that there should be equal pay for substantially equal work and that differences in rate of compensation paid to different employees should be in proportion to substantial differences in difficulty,

responsibility , and **qualification** requirements of the work performed, In view of this, the FPM further states that details must be kept to the shortest practical time and that under no circumstances may they extend beyond 6 months without appropriate position classification action.

We found instances of violation of the above-stated CSC policy. At one installation we identified 18 instances in which employees had been detailed for periods in excess of 6 months to duties that had not been classified, six of these details having been in excess of 1 year. At another installation a Supply Management Officer , pay grade GS-12, was officially detailed to an unclassified position as of July 24, 1966, This detail was officially terminated January 23, 1967, and on January 26, 1967, the employee was placed on detail again for 180 days to the same unclassified position. The latter detail was not extended and the employee was still performing the detailed duties as of August 8, 1967.

Breaking details prior to, and  
redetailing immediately after, expiration  
of 6-month periods

At one installation, apparently in order to eliminate the necessity to secure CSC approval for details in excess of 6 months, the details were being broken just prior to the expiration of 6 months by returning the employees to their official duties for a few days, The employees could then be detailed again ~~for~~ a 6-month period. Such a practice appears to be in conflict with the intent of the CSC regulation, but we found numerous instances to indicate that this practice had been used.

To illustrate, a Supply System Analyst, **GS-11**, was detailed to the vacated, established, Supply Management Officer, GS-12, position mentioned above, on July 24, 1966. This detail was officially discontinued as of January 23, 1967. However, the employee's personnel folder showed that he was again placed on detail to the same GS-12 position for the period January 26 through July 24, 1967. He was still performing the duties as of August 8, 1967, even though the detail had not been officially extended.

## Details to higher grade positions

Large numbers of details were being made to higher grade positions. The failure to properly record such 'details so that the additional experience gained is a matter of record and can be considered for promotion purposes may be adverse to the interests of the employees being detailed.

In some instances, we found that, although the detail had not been properly recorded, the employee was ultimately promoted into the position. On the other hand, we found some instances where it was apparent that, had the additional work experience been recorded, the employee should have been considered for promotion.

En contrast, some installations which were not properly recording details were advertising position vacancies when they occurred and were permitting all those employees who considered themselves eligible for the position to make application and submit their experience and qualifications. We were advised that under these circumstances the employee's resume of experience was used rather than the data recorded in his personnel file.

## Temporary promotions in lieu of details

We found that, in addition to the detailing of employees, several installations, to a limited degree, used temporary promotions to fill vacancies or to establish supervisory positions. The CSC, by Bulletins 300-16 and 335-7 dated April 22 and August 5, 1968, respectively, has approved regulatory changes encouraging the use of temporary promotions instead of details to higher positions, where practicable, and has simplified the administrative procedures applicable to such promotions.

Employees serving under temporary promotions receive the pay of the higher grade for the duration of the temporary promotion. In contrast, employees on detail receive pay based on their official assignments and not on the duties or positions to which they are detailed, Chapter 335 of the Federal Personnel Manual provides that an employee should be fully informed, in advance of a temporary or

limited promotion, of the nature of the transaction and of all conditions relating to it, including the fact that he will be returned to his former position when the period expires, The action should be documented to show that the employee has full knowledge of the action taken and the condition under which the promotion is made. When a temporary promotion lasts for more than 1 year, the agency is under instructions to make periodic reviews (at least annually) to determine whether the promotion can be made on a permanent basis.

At one installation the records showed that 84 temporary promotion actions were processed during the months of August and November 1967. At this same installation, during September 1967 a labor/management agreement was executed for the ensuing year. Included in this agreement were provisions whereby technical employees would be granted temporary promotions in lieu of details when positions were classified at wage rates higher than those the employee was then earning. This provision applies to employees who are temporarily assigned to supervisory positions as well as nonsupervisory positions for periods in excess of 30 days. (See p. 18.)

#### Details to lower grade positions

Details are usually considered in terms of gaining experience for higher grade jobs or positions; however, we found extensive detailing of higher grade employees to lower grade jobs or positions for long periods of time.,

At one installation we noted a group approval by the CSC Regional Office of the detail of 240 employees for 18 months. All but five of these employees were detailed to lower grades. The reason given for the request was that their skills were not currently needed but would be needed later.

At another installation we found extensive detailing of employees to lower grades for periods of 60 to 360 days, We selected 45 employees, most of whom had been on detail for 6 months, to ascertain the range of hourly pay differential to the Government as a result of such details. We found the difference to be from 13 to 87 cents an hour with the majority falling between 40 and 60 cents an hour,

We discussed the practice of detailing employees to lower grade positions with a civilian personnel official at this installation. He informed us that the civilian personnel office had no specific policy relating to details to lower grade positions. He indicated that the detailing to lower grades could be due to the employees health, the slow-down of work in an area, or the need for accomplishing certain lower grade work during periods when the civilian personnel office was unable to recruit personnel for the lower grade positions. We did not attempt to evaluate the need for specific details of this type,

Lack of effective internal audits  
and reviews of detailing operations

As a part of our review, we examined the limited number of reports available evidencing reviews of personnel operations by appropriate internal audit and review staffs and by CSC Regional Offices, as they related to the detailing of civilian employees.. Although several of the civilian personnel officers we interviewed were aware of their lack of control over the recording and approval of details, we found little evidence at most of the installations we visited that internal audit or review staffs or CSC inspection teams had found the types of deficiencies we found or that, if they did, they had identified the causes and made meaningful recommendations for remedial action.

In Bulletin No. 300-16 dated April 22, 1968, addressed to the heads of Federal agencies, the CSC asked agencies to reappraise practices that contribute to long details. CSC offices were instructed not to grant agency requests for extension of details beyond 6 months unless the agency could demonstrate that the details were the only practicable means by which it could get the necessary work done and could assure further that employee equity would not be adversely affected. While we are hopeful that this bulletin will lead to improvement in agency practices, we believe that increased surveillance at local level will be required to ensure this.

Personnel folder record inadequate  
as basis for establishing detail history

By interviewing employees and their supervisors and examining supervisors' records and cost data records, we found that the information in the employees' personnel folders as to details, in many instances, was inaccurate, incomplete, or not a matter of record,

Also, at one installation we attempted to determine the experience with which several employees should have been credited by reason of details they had been on over a period of about 3 years. Because of the conflicting information we received from the employees, their supervisors, and the records in their personnel folders as to the numbers and lengths of their details, we were unable to determine the proper amount of detail experience creditable to each employee,

## Conclusions and agency comments

The detailing of civilian employees is an accepted management practice to meet temporary needs of an agency's work program. Agencies are responsible, however, for keeping details within the shortest practicable time limits, for ensuring that appropriate records are made of the details, and for ensuring that details do not compromise the principles of the merit system.

We believe that the regulations issued by the CSC and the military departments concerning detailing are adequate to protect the interests of both the employee and the Government. Our review, however, showed a lack of adequate management controls over detailing, resulting in the improper detailing of employees and in a failure to properly record some details in employees' personnel records,

In our opinion, the detailing of large numbers of employees without proper recordkeeping compromises management's ability to evaluate the adequacy of its manning tables and personnel requirements for its various organization components. Also, the existence of abnormally lengthy and unrecorded details compromises the open competitive principle of the merit system and the principle of job evaluation **and** weakens the controls developed to protect the interests of employees serving on details.

We brought our findings and conclusions to the attention of the Secretary of Defense and proposed that he establish a program that would provide greater command emphasis to ensure the establishment and maintenance of adequate management controls over detailing at the installation level.

Specifically, we suggested that civilian personnel offices be directed to (1) increase their surveillance of detailing at the employee/supervisor level by more effective use of personnel technicians presently assigned to such offices, (2) make greater use of available cost-accounting data to control the lending and borrowing of employees, (3) establish proper controls to ensure that recorded details are terminated on time and that CSC approval is

secured when required, and (4) require, when appropriate, that due consideration be given to reassignment, demotion, or promotion (temporary or permanent) in lieu of long details,

The reply from the Department of Defense (app. 11), in general, concurred in our proposals and cited the rapid expansion of the Military Establishment associated with Southeast Asia support, the period of instability caused by the Department's Base Closure Program and numerous reorganizations, and severe skilled manpower shortages as compensating factors which the Department believed had contributed to the irregularities we found. It outlined the actions which would be taken in each of the military departments and the Defense Supply Agency and advised that they would periodically review this matter with the concerned components to ensure that a proper degree of control of the detailing of civilian employees is maintained. We are requesting the Secretary of Defense to advise us when the actions are completed and to keep us advised of the results of the periodic reviews.

The reply from the CSC (app. III) stated, in part, that its inspection activity differed fundamentally from that of the GAO in both objectives and techniques. The CSC conducts general inspections to evaluate the total personnel management program of an installation; thus its inspections are broad-band reviews of personnel management rather than audits of a particular aspect of operations. The reply further stated that CSC could not concentrate its inspection resources on an exhaustive review of detail management without omitting coverage of other important areas in which it had leadership and enforcement responsibilities.

To better focus on the problems identified in this report, CSC is issuing further guidelines to its inspectors to ensure more specific coverage of detailing in their inspections. We are requesting the Chairman of the CSC to furnish us a copy of these guidelines when they are issued,

Congressman **Moss** introduced a bill (H.R. 11184) in June 1967, which would extend to classified and **Wage** Board employees the right to the higher rate of pay after a detail of 30 days, **The** bill **was** referred to the Committee on **Post** Office and Civil Service for consideration.

## SCOPE OF REVIEW

In performing our review, we examined appropriate Department and Command regulations and the personnel office's operating instructions at each of the installations we visited. In addition, we examined selected personnel files and records and supervisors' records, when available, for parts of fiscal years 1966, 1967, and 1968, and we interviewed selected supervisory and nonsupervisory employees.

We discussed our findings, including the authorization, termination, and recordation of details, with appropriate installation officials responsible for the management of civilian employees.

Reviews were performed at the following installations:

**Air Force:**

Sacramento Air Materiel Area, McClellan Air Force Base, California

Warner Robins Air Materiel Area, Robins Air Force Base, Georgia

San Antonio Air Materiel Area, Kelly Air Force Base, San Antonio, Texas

Ogden Air Materiel Area, Hill Air Force Base, Ogden, Utah

**Army:**

U.S. Army Aeronautical Depot Maintenance Center, Corpus Christi, Texas

Tooele Army Depot, Tooele, Utah

Picatinny Arsenal, Dover, New Jersey

**Navy:**

Portsmouth Naval Shipyard, Portsmouth, New Hampshire

Naval Air Rework Facility, Naval Air Station, Alameda, California

**Defense Supply Agency:**

Defense Depot Ogden, Ogden, Utah

**APPENDIXES**

PRINCIPAL OFFICIALS OF  
THE DEPARTMENT OF DEFENSE  
RESPONSIBLE FOR ADMINISTRATION OF ACTIVITIES  
DISCUSSED IN THIS REPORT

	<u>Tenure of office</u>	
	<u>From</u>	<u>To</u>
<u>DEPARTMENT OF DEFENSE</u>		
SECRETARY OF DEFENSE:		
Clark M. Clifford	Mar. 1968	Present
Robert S. McNamara	Jan. 1961	Feb. 1968
ASSISTANT SECRETARY OF DEFENSE (MANPOWER AND RESERVE AFFAIRS) :		
Alfred B. Fitt	Oct. 1967	Present
Thomas D. Morris	Oct. 1965	Sept. 1967
<u>DEPARTMENT OF THE AIR FORCE</u>		
SECRETARY OF THE AIR FORCE:		
Dr. Harold Brown	Oct. 1965	Present
ASSISTANT SECRETARY OF THE AIR FORCE (MANPOWER AND RESERVE AF- FAIRS) :		
J. William Doolittle	Apr. 1968	Present
Dr. Eugene T. Ferraro (acting)	Jan. 1968	Mar. 1968
DEPUTY UNDER SECRETARY OF THE AIR FORCE (MANPOWER) (abolished) :		
Dr. Eugene T. Ferraro	June 1966	Dec. 1967
<u>DEPARTMENT OF THE ARMY</u>		
SECRETARY OF THE ARMY:		
Stanley R. Resor	July 1965	Present

PRINCIPAL OFFICIALS OF  
THE DEPARTMENT OF DEFENSE  
RESPONSIBLE FOR ADMINISTRATION OF ACTIVITIES  
DISCUSSED IN THIS REPORT (continued)

<u>Tenure of office</u>	
<u>From</u>	<u>To</u>

DEPARTMENT OF THE ARMY (continued)

**ASSISTANT SECRETARY OF THE ARMY**

(MANPOWER AND RESERVE AFFAIRS):

William K. Brehm	Apr. 1968	Present
Arthur W. Allen, Jr. (acting)	Jan. 1968	Mar. 1968

**DEPUTY UNDER SECRETARY OF THE ARMY**

(MANPOWER) (abolished) :

Arthur W. Allen, Jr.,	Oct. 1963	Dec. 1967
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DEPARTMENT OF THE NAVY

**SECRETARY OF THE NAVY:**

Paul R. Ignatius	Aug. 1967	Present
John T. McNaughton	July 1967	July 1967
Paul H. Nitze	Nov. 1963	June 1967

**ASSISTANT SECRETARY OF THE NAVY**

(MANPOWER AND RESERVE AFFAIRS):

Randolph S. Driver	Apr. 1968	Present
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**DEPUTY UNDER SECRETARY OF THE NAVY**

(MANPOWER) (abolished) :

Randolph S. Driver	Aug. 1967	Mar. 1968
Richard A. Beaumont	Jan. 1966	Aug. 1967



ASSISTANT SECRETARY OF DEFENSE  
WASHINGTON, D.C. 20301

MANPOWER AND  
RESERVE AFFAIRS

23 JUL 1968

Mr. William A. Newman, Jr.  
Director  
Defense Division  
U. S. General Accounting Office  
Washington, D. C. 20548

Dear Mr. Newman:

The Secretary of Defense has asked me to respond to your letter of 16 May 1968 regarding your draft report on the management of the detailing of civilian employees of the Department of Defense, OSD Case #2766.

It is evident from the report of the limited review made by your office of the policies and practices of the Department of Defense as they relate to the detailing of civilian employees of field activities that deficiencies in recording and securing approval of details exist at the ten installations included in the audit. This obviously, leads to a conclusion that inadequate detail procedures widely prevail throughout the Department of Defense. However, it is considered that comparative data on a significantly larger number of installations of varying size and mission would be necessary to support a final conclusion of a general management disregard for the regulations concerning details.

While we do not excuse the irregularities found in your review of the ten industrial-type military installations, we believe that there are Compensating factors which have contributed to this situation. Those include:

- a. the rapid expansion of the military establishment during the period covered by the review (fiscal years 1966-1968) due to assignment of special programs associated with Southeast Asia support and reassignment of weapon systems support responsibilities have caused unusual fluidity that necessitated extensive use of details until permanent staffing could be effected.

- b. During the period covered by the review, numerous installations were seriously affected by the Department of Defense Base Closure Program and numerous reorganizations. This was an unprecedented period of instability in terms of personnel versus positions and mission versus personnel resources. Personnel adjustments could not be made, in many cases, in a period of three to six months (the time frame of a normal detail) and excessive workloads in civilian personnel offices affected the ability of such offices to exercise normal control and surveillance over details.
- c. Severe skilled manpower shortages resulting in the non-availability of some skills in highly competitive markets increased the need for temporary shifts of available manpower to meet essential mission requirements.

It is noted in the draft report that existing regulations of the military departments are considered adequate to protect the interest of both the employees and the Government. Consequently, the deficiencies noted result from lack of management controls to assure compliance with these regulations. We do agree, however, with the basic recommendations in your report that the local personnel officers be directed to increase their surveillance of this area at the employee/supervisor level and assure that proper controls are observed and that internal audit and review groups increase their surveillance of these matters. The actions which will be taken in this regard in each military department and the DSA are outlined below:

- a. Department of the Army

1. The survey procedures used by the Office of the Deputy Chief of Staff for Personnel in conducting frequent on-site reviews of civilian personnel programs at the installation level include a review of a sample number of detail actions for compliance with the regulations issued by the Department of the Army and by the U. S. Civil Service Commission. Additionally the survey procedures provide for the use of supervisory effectiveness interviews. These interviews are highly effective in determining supervisory knowledges and attitudes in a variety of program areas. Among the areas in which supervisors are questioned is that of employee assignments. As another facet of the survey procedure a representative

number of employees complete a questionnaire regarding personnel practices at the installation. Included in the questionnaires are items regarding the accuracy of job descriptions and assignments. Tabulation of the questionnaires results in the quick identification of undesirable trends. Increased attention will be given to details in the civilian personnel programs to identify trends of poor supervisory practices or morale problems of the type highlighted in the GAO report.

2. Position review requirements during cyclic position classification surveys require each supervisor to review each position within his area of responsibility on an annual basis. Further, the supervisor is required to certify to the accuracy of the job description and to the necessity of the position for efficient operation. Each employee also certifies to a discussion of his job description with his supervisor and to the accuracy of the job description on an annual basis. As an additional verifying factor at least 10 percent of the total positions in each organization are subjected to a desk audit by a Position Classification Specialist. This desk audit serves to further substantiate the accuracy of the job description in describing the duties actually performed by the employee and to validate the grade, title, and series to which the position is classified. Any discrepancies discovered are corrected and proper personnel actions taken.
3. The Office of the Deputy Chief of Staff for Personnel is taking appropriate action by official communication to bring to the attention of all commanders the necessity for controlling the temporary assignment or detail of civilian employees.

b. Department of the Navy

1. Action will be taken to have supervisors reminded of the basic rules on details and emphasize the responsibility of civilian personnel offices to use existing systems to monitor the administration of details. Particular attention will be given to the responsibility for recording, timely termination and requisite approval of details.
2. Emphasis will be placed on using existing program elements (Position Management Program, annual position review required by the Whitten Amendment, classification audits and surveys, organizational surveys, complaint and grievance process, etc) to identify and correct such infractions as may otherwise occur.

c. Department of the Air Force

1. The necessity for continued control and surveillance activities by civilian personnel offices will continue to be emphasized in the internal review and evaluation activities and in directives to the field.
2. USAF Survey Teams (which evaluate civilian personnel programs) Will be instructed to give added special attention to this area during their visits. Major commands, intermediate commands, and base civilian personnel offices will receive similar instructions. In addition this subject will be highlighted in forthcoming issues of the Air Force Civilian Personnel Letter, which goes to all civilian personnel offices and in the Inspector General Brief which is distributed to all commanders and operating officials. These actions coupled with the new directives discussed above will help materially in achieving the goal of efficient and judicious use of employee details in the management of civilian personnel resources. The Office of the Inspector General has stated that in the event expanded internal reviews are required they will add this area to their inspection coverage on request. In the case of the USAF Auditor General, the particular area covered by the General Accounting Office report has not been included in previous audits. However they will consider the area for future audit coverage consistent with other audit priorities. Air Force policy issuances have consistently encouraged reassignment, temporary or permanent promotions or other personnel actions in lieu of lengthy details.
3. A study will also be made of how cost accounting data can be better utilized to control the lending and borrowing of employees as suggested in the General Accounting Office report. Obtaining further positive top management interest and support in this matter and developing a similar interest and awareness at all levels of management will, in the long range, provide a permanent solution to this problem.

d. Defense Supply Agency

1. The recommendations for added management controls in the draft report will be reemphasized. Also, it is planned to continue and to intensify surveillance through management surveys, Inspector General reviews, and internal audits.

We believe that existing policy and procedural instructions relating to details of civilian employees in Department of Defense components are adequate and this is so stated in the draft report. Therefore, it is considered that the above actions being taken by the military departments and the Defense Supply Agency will provide better surveillance in this area resulting in improved local management controls. We will periodically review this matter with the concerned components to assure that a proper degree of control on the detailing of civilian employees is maintained.

It is considered that your draft report and the positive actions taken by the military departments and the Defense Supply Agency will result in improved management practices concerning details. We appreciate receiving the views of your organization on this important aspect of management.

Sincerely,

A handwritten signature in black ink, appearing to read "J. B. Lampert". The signature is written in a cursive style with a large, sweeping initial "J".

J. B. Lampert  
Lieutenant General, USA  
Deputy



UNITED STATES CIVIL SERVICE COMMISSION  
WASHINGTON, D.C. 20415

IN REPLY PLEASE REFER TO

JUL 15 1968

YOUR REFERENCE

Mr. William A. Newman, Jr.  
Director, Defense Division  
United States General Accounting Office  
Washington, D. C. 20548

Dear Mr. Newman:

Thank you for sending us copies of your draft report on the management of the detailing of civilian employees of the Department of Defense.

We have thoroughly reviewed the report and consider it comprehensive and generally well presented. There are, however, several findings which we believe should be restated in the interests of increased accuracy and objectivity of presentation. I understand that the report was the subject of an informal meeting between members of our respective staffs last month and that the desirability of certain changes was discussed at that time. The items in which we suggest revisions are as follows:

Conflict between Federal Personnel Manual and statute [See GAO note.]

The footnote on page 3 of the report refers to an apparent conflict between the Federal Personnel Manual, which is stated to authorize details of six months duration, and 5 United States Code, section 3341, which limits details to 120 days. The question of conflict is also raised on page 15 of the report, under the heading Conclusions.

We submit that there is no conflict, although we acknowledge that the limit for Commission prior approval has perhaps given the impression that it was synonymous with the provisions of law.

Section 3341 authorizes department heads to make details and, moreover, places no limitation on the number of times a detail may be renewed. It speaks of renewal for "periods not exceeding 120 days;" and, prior to codification, the applicable provision stated that details "may, on expiration, be renewed from time to time ..." (Emphasis added.) The clear implication is that successive renewals are allowable. However, since details are supposed to be for the temporary performance of the duties of another position, and since extended details may involve conflict with other provisions of law, the Commission imposed the requirement that the period of detail could not exceed six months without prior Commission approval. This requirement was, in effect, our means of assuring that the applicable laws governing pay and the merit system were observed.

THE MERIT SYSTEM—A GOOD INVESTMENT IN GOOD GOVERNMENT

The relationship between section 3341 and the Commission's instructions in the Federal Personnel Manual was the subject of correspondence with the Department of the Air Force in January 1967 and the Department of Defense in August 1967. For example, in a letter dated August 31, 1967, to the Office of the Assistant Secretary of Defense (Manpower) we stated:

"As I indicated in January to the Air Force, all parts of the Department of Defense are subject to the 120-day restriction in 5 U.S.C. 3341, which applies to all Executive departments and the military departments. Authority to make a second detail for a full 120 days under 5 U.S.C. 3341 is subject to Commission approval of the extension of the detail beyond the initial six months. Any extension up to the six-month period (for example, an extension of 30 days to an initial 120-day detail) would not require the Commission's prior approval."

I am informed that, in last month's meeting, the question of conflict was discussed with Mr. Ralph Ramsey, your Associate General Counsel, and that he expressed the opinion that our Federal Personnel Manual instructions were not in conflict with section 3341. It would appear, therefore, that the wording of the report should be modified to clarify that our instructions do not authorize details for up to six months, but rather place a six-month limitation on the unreviewed exercise by departments of the authority they have under section 3341.

Some time ago we undertook a study of the whole question of details and their duration, as reflected in the report. This study has been completed and the decision reached to reduce from six months to four the maximum duration of a detail without prior Commission approval. Appropriate changes to the Federal Personnel Manual will be published shortly. The limitation on the duration of details imposed by our instructions will thus coincide with the period of detail authorized by section 3341, so that there will no longer be any possibility of misinterpretation.

[See GAO note.]

Circumvention of detail requirements at suggestion of Commission employees

On page 11, the report states that information was received from one installation that local Commission employees had advised the installation how to circumvent detail requirements. The report acknowledges that this information could not be confirmed, but the wording of the acknowledgement carries a clear implication that it could not be confirmed because the Commission officials with whom it was discussed could be counted on to deny it.

I understand that my representatives explored this matter at considerable length in their meeting with members of your staff in an attempt to gain specific information as to where, when, and by whom the advice to circumvent detail requirements was given. I am told, however, that no such specific information was produced. Accordingly, I am concerned over the inclusion

in the report of a serious reflection against the integrity of Commission employees for which there is no apparent factual support. The presentation of an unsubstantiated allegation as a finding is not in keeping with the otherwise constructive and objective tone of the report, and we request that it be deleted.

We do not take issue with the finding that detail requirements were circumvented. We concur in the need to tighten controls and so instructed our regional offices in an internal issuance last April. This instruction, CSC Operations Letter No. 300-48, was mentioned in CSC Bulletin No. 300-16, cited on page 17 of the report. In addition, all Commission inspectors are being instructed to look with particular care into situations in which employees were detailed for short of six months and then redetailed after a break of a few days, for an aggregate period of over six months.

#### Commission review of detailing operations

The report indicates in a number of places that the Commission has not been sufficiently attentive to its responsibility to review compliance with and enforce detail requirements. On page 7, for example, the report states that there was little indication at the locations visited that the Commission had reviewed in depth the extensive detailing operations carried on during the periods considered in your review; on page 14 it is stated that there was little evidence at most of the installations visited that Commission inspection teams had found the types of deficiencies found by your teams, or, if found, had identified the causes and made meaningful recommendations for remedial action.

It should be understood, by way of general background, that the inspection activity of the Commission differs fundamentally from that of the General Accounting Office in both objectives and techniques. The Commission conducts general inspections to evaluate the total personnel management program of an installation or department, during which we cover all program areas -- work organization and position management, recruitment, promotions, training, etc. The depth in which the various areas are covered may vary, depending on the problems and needs found to exist, but all areas are covered to the extent necessary to permit an overall evaluation. We also conduct special inquiries which focus on one or more areas of high Presidential interest, such as equal employment opportunity for minority groups, the Federal Women's program, and improvement of communications and contacts with the public. Thus our inspections are broad-band reviews of personnel management rather than audits of a particular aspect of operations. We could not concentrate our inspection resources on an exhaustive review of detail management without omitting coverage of other important areas in which we have leadership and enforcement responsibilities. We suggest that the report recognize this difference in approach.

We conducted general inspections at four of the installations visited by your teams and special inquiries at five. We cannot compare our findings on detail management with those of your teams, since the report does not

specify the nature and extent of the problems and irregularities found in each of the installations visited. We did, however, find significant detailing problems at five of the ten installations listed in the report and took positive action to have them corrected. To illustrate:

- In August and September of 1967 we looked into allegations of racial discrimination at Army's Picatinny Arsenal. One important finding in our review was that the allegations, although not corroborated, did have a basis in terms of questionable personnel management practices growing out of manpower controls. Long-term details were impairing effective mission accomplishment, creating serious inequities, and contravening the spirit and intent of law and regulation. We pointed this out in our report to Picatinny and also in a letter to the Secretary of the Army which approached the matter of details from an Army-wide standpoint. A copy of this letter was made available to the members of your staff with whom my representatives discussed the report.
- Our August 1967 inspection at the Sacramento Air Materiel Ares, McClellan Air Force Base, found serious deficiencies in the use and control of details. One of our recommendations was that a task force be established by the installation with specific responsibility for defining to managers the proper use of details; reviewing and recommending revisions in procedural requirements as necessary for more effective control of details; streamlining detailing processes to the extent possible to facilitate their proper use; exploring the possibility of greater use of temporary promotions in lieu of details to higher-grade positions; and putting into operation a system of surveillance and continuing evaluation to detect and promptly correct problem areas in detailing. The task force was established and acted on our recommendations. We have scheduled a followup inspection at McClellan for the first quarter of fiscal year 1969.

To further illustrate the action we have taken to improve detail management in the military departments, we cite our visits to Department of Defense in-house laboratories to explore personnel management and manpower problems in May and June of 1967. In our overall report, a copy of which was sent to the General Accounting Office on request, we described the effects of Tables of Distribution and Allowances (TDA) in the Department of the Army as a cause of unreasonably long details of employees out of grade and as an adverse morale factor. The Deputy Secretary of Defense directed the military departments to review our report and to develop positive plans of action to resolve the problems identified, including the problem of details. We expect a report from the Department of Defense shortly on the action taken in response to our findings.

Thus, while we do not review detail management extensively as a matter of general routine at every installation we visit, we take positive action to correct misuse of detail authority whenever such action is found to be needed. However, to better focus on the problems identified in this report,

we are issuing further guidelines to our inspectors to assure more specific coverage of detailing in our inspections,

Responsibility for the management of details [See GAO note.]

The report expresses the belief that the management of details is the responsibility of civilian personnel officers (pages 16 and 18). We agree that local civilian personnel officers play a significant role in the management of details, and usually are assigned the important responsibility of monitoring details, but we do not believe that they have the authority necessary for the effective management of details.

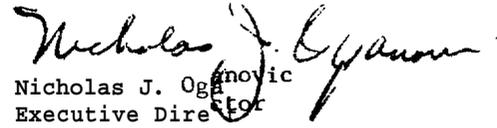
Our inspections have time and again shown that controls over manpower, organization, and positions are among the major causes of misuse of detail authority. Agency top management has responsibility for these controls, and local managers must comply with them in accomplishing their missions. We are convinced that top management must take action to achieve a balanced and coordinated relationship between manpower controls, mission accomplishment, and employee equity if misuse of detail authority is to be corrected. Further, it should be recognized that civilian personnel officers cannot alone assure compliance with governing requirements. Action to assure the proper and effective exercise of detail authority must be taken by both civilian personnel officers and line managers, and what the former can do without the cooperation and support of the latter is limited. We suggest, therefore, that the report use some such term as "monitoring" or "surveillance" instead of "management" in referring to the responsibility of civilian personnel officers.

There is one further item in the report on which we would like to comment: the conclusion that the use of temporary promotions would eliminate many of the failures to keep proper records of details. We are in complete agreement, and would like to bring to your attention a regulatory change recently approved by the Commission to encourage the use of temporary promotions instead of details to higher-grade positions. Hitherto, an agency has been required to use adverse action procedures to terminate a temporary promotion that has lasted for more than 90 days. Agencies have tended to avoid this cumbersome procedure by the use of details. Under the new regulations, an agency may make a temporary promotion for up to one year, and extend it for not to exceed one additional year, without being required to use adverse action procedures to return the employee to his regular job. This simplification of procedures will make it administratively much easier for an agency to use temporary promotions.

**GAO note:** Material included in our draft report has been revised or omitted from this report to give consideration to comments received from the agency.

We appreciate the opportunity to comment on the draft report so that our views can be given consideration in preparing the report in final form.

Sincerely yours,

  
Nicholas J. Oganovic  
Executive Director