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AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES
COUNCIL of NATIONAL ARCHIVES LOCALS

Date: February 6, 2026
From: Audrey Amidon, AFGE
Subject: FY2025 Appraisal Rating Procedures and Training
To: Ovnelle Millwood, Chief Human Capital Officer

This statement is to notify the National Archives and Records Administration (NARA) that the American Federation of Government Employees (AFGE) is invoking the negotiated grievance procedure as outlined in Article 27 of the National Agreement between NARA and AFGE. This grievance procedure is being invoked to seek remedy for violations of 5 USC 43, Article 18 and Article 3 Section 5 of the Collective Bargaining Agreement, NARA 356, and all other applicable provisions of the Collective Bargaining Agreement, laws, rules, and regulations.

Description of Violation and Basis for Grievance:

On June 17th, 2025, the Office of Personnel Management issued guidance to federal agencies titled "Performance Management for Federal Employees," which laid out an imperative to make changes to the federal performance management system. In response, the Agency announced at the September 10, 2025 All Staff Meeting that it would engage in a process of "ratings normalization," beginning with ratings issued for the FY2025 performance appraisal cycle. The Agency has maintained that this "normalization" consists only in ensuring that existing policies and procedures are being correctly applied by rating and reviewing officials as they rate their employees. However, since the issuance of FY2025 appraisals, it has become clear that the Agency engaged in a variety of violations of the National Agreement, NARA policy, and federal rule and regulation in their "normalization" process, as detailed below.

Improper Performance Management Training Across the Agency

This year's training for supervisors and front-line employees on Performance Management for FY2025 included repeated guidance to judge performance against employees' position descriptions. During the September 10, 2025 All-Staff Meeting, Carrie Ridings, Director of Workforce Strategy and Analysis Division, said, "a fully successful rating means that an employee has met the expectations that are outlined within their position description. Position descriptions are written at the fully successful level." This was reiterated during the managers and supervisors trainings on performance management in December.

As is established in Article 18 of the CBA and NARA 356, "the performance appraisal is the process of comparing actual job performance against performance standards, rating each

critical element, and calculating a summary rating,” and “the rating of record [...] is determined by evaluating the employee's performance against the employee's written performance standards.” It is to be noted that the only legitimate definition of what the different ratings mean is contained in the CBA. This definition does not reference the position description. While performance standards should be connected to the position description, in policy and contract, only the performance standards and the employee’s actual performance should be used to determine a rating.

It is clear that supervisors and managers found their training on the new performance appraisal process confusing. NARA turned an otherwise simple task into a complex and unclear exercise in trying to read the minds of upper management unfamiliar with the actual work done by employees. Supervisors were left struggling to follow arcane guidelines and fulfill arbitrary word limits instead of meeting the actual purpose of the exercise: to compare their employees’ performance to the performance standards. It is likely that at least some employees did not receive a fair and appropriate rating because of their supervisor’s inability to convey the quality of their work under such circumstances.

During the December 3, 2025 training session on writing self assessment narratives, employees were repeatedly told by Carrie Ridings that accomplishments that are not listed in their position description cannot be considered “above and beyond,” whether or not their supervisor assigned the tasks. As most, if not all, position descriptions include “other duties as assigned” and employees are expected to complete work assigned by their supervisor, this is poor guidance that almost certainly led to poor self-narratives and assessments.

The Agency’s unclear instructions led to supervisors’ incorrectly interpreting and applying the provisions of Article 18 of the Collective Bargaining Agreement, which, as stated above, requires that employees’ performance be rated against their performance plan. This can be seen in the fact that several supervisors told bargaining unit employees that their appraisals were returned multiple times for rewrites before finally being approved for release to the employee being appraised.

On February 6, 2026, in a grievance appraisal decision received from ██████████ in response to ██████████’s performance grievance, the Agency conceded that conducting performance appraisals by comparing employee performance to the position description leads to the appraisal being invalid, and required that appraisal to be reissued. This admission is enough to invalidate the entire FY2025 performance appraisal process for the Agency and should result in either every appraisal being reissued or employees’ appraisal rating reverting to that of the previous year.

Failure to Provide Access to Position Descriptions

Although the Agency is clearly in error in using the position description to determine the annual rating, even if this were appropriate, bargaining unit employees were not issued the position description at the beginning of the rating period, meaning that they would never have been able to work to improve their performance based on the Agency’s criteria. Many employees said they

had never seen their position description or only received it after the close of the rating period when they were instructed to consult the document in preparing their self-narrative of accomplishments. 5 USC 43, NARA 356, and Article 18 all require that employees be issued a performance plan at the beginning of the rating period. If there were to be additional standards against which employees would be rated, the Agency must issue those standards as well.

Failure to Provide Access to Performance Standards

In at least one area of the agency (Civilian Personnel Records Center, Valmeyer, IL), employees were informed at the end of the fiscal year that they were no longer going to be assessed only on the basis of one metric (cycle times) but also other, unspecified criteria. Additionally, the employees were only informed of this change at a point when they were no longer able to adjust their performance to succeed given the new metrics. In fact, it would have been impossible for them to do so, since the employees were not informed which metrics would now be used to rate their performance. Per the CBA, Article 18, Section 4.A, "Performance plans will be issued on an annual basis, or when the employee changes positions, *or when a critical element or performance standard is changed*, or when the employee is assigned to a new supervisor" (emphasis added).

Failure to Issue Performance Appraisals by the Agreed Upon Deadline

On November 17, 2026, the Agency informed the Union of its intention to extend the deadline to issue performance appraisals until January 9th, 2026, due to the 2025 lapse in appropriations. The Union concurred with this change to the deadline. However, employees in some units, including RPT and the presidential libraries, did not receive their appraisals until the end of the following week, after the deadline had passed. Some Federal Register employees still had not received their appraisals by the end of January. The Union received no notification or request for an extension for supervisors who had not yet issued their appraisals. This failure to either adhere to the agreed upon deadline or to follow the past practice for requesting extensions shows an evident lack of regard for the procedural requirements of the National Agreement. It also underscores the confusion that rating officials across the agency were experiencing while trying to adhere to the new model for writing appraisal narratives and determining ratings. Finally, this delay further reduces the amount of time the employee has to understand their rating and apply feedback received to the FY2026 rating period to strive for a higher rating.

Performance Standards must be equitable and attainable

In previous years, a single example of Highly Successful or Outstanding work was sufficient for a critical element to be rated at that level. The fact that supervisors are now required to present 2-3 examples of Highly Successful or Outstanding work creates an unattainable standard across the agency, with a disproportionate impact on lower graded employees whose work is less varied, more standardized, and has less opportunity for innovation. During the December 2, 2025 performance management training provided to supervisors and managers, a federal records center director raised this specific issue and expressed his concern that it was "unfair" to assess his lower-graded employees in this way. Ms. Ridings stated that the employees would be expected to "come up with new ways to collaborate" and that they already receive

productivity awards, implying that the amount of work completed by the employee essentially does not matter for the annual assessment.

A December 11, 2025 email to supervisors in Research Services confirmed this, adding that supervisors could only include an accomplishment in one critical element, even if elements of the accomplishment might have crossed multiple critical elements. This is problematic on several levels. First, it means that supervisors are not appropriately evaluating employees' work if it crosses multiple critical elements, as many tasks do. Second, it particularly penalizes lower graded employees because they have fewer tasks. Per the CBA, Article 18, Section 3D, "Performance standards will be clear, attainable, and, to the extent possible, measurable and Outcome-oriented ... Performance standards will be formulated in a manner that is impartial, equitable, and fair."

Productivity Awards and recognition should not count against a higher performance rating

Ms. Riding's statement that employees working to production standards are eligible for productivity awards implies that receiving a productivity award for outstanding production somehow negates the need to subsequently assess their work as outstanding. While performance and productivity awards are useful tools to reward exceptional work, they have nothing to do with the performance appraisal, which per NARA 356, involves "accurately and appropriately rating employee performance against the standards in the employee's performance plan." A performance or productivity award functions in addition to, not instead of, recognition of exceptional work.

Similarly, a Research Services rating official in College Park was told by their reviewing official that they could not include work on the high-visibility, agency-priority assassination records releases in their employees' narratives to support a higher than Fully Successful rating because the employees had already received Certificates of Achievement for performing that work. Again, the annual appraisal is an assessment of the entirety of the employee's work for the year, not just work that has not been previously rewarded. It is unclear where this gross misunderstanding originated, but it is completely incorrect, and present in geographically and functionally different organizations across the agency.

Disregard for established performance management guidelines

According to training released by the Office of Personnel Management on December 3, 2025, a good performance standard is one that can be easily measured.¹ Many employees do have metrics-based standards in Critical Elements 1 and 2. Across the agency, particularly in lower-graded technician positions, employees achieved the metrics at the Outstanding level in their performance plan only to be assessed in their appraisal at Fully Successful for Critical Element 1.

¹ Performance Management Training for Supervisors, Lesson 11: Performance Elements and Standards <https://www.opm.gov/policy-data-oversight/performance-management/performance-management-toolkit/supervisor-training/index.html>

This occurred because in addition to ignoring NARA policies and the CBA, the Agency also ignored OPM guidance on evaluating employee work using quantitative metrics. For example, a rating official told an employee occupying a GS-12 1420 Archivist position, that it did not matter how many reference letters the employee answered or how quickly the employee answered them, because answering reference letters is part of the position description and the accomplishment could not be interpreted to support an Outstanding rating for critical element 1. This directly contravenes the example provided in OPM's training where a Fully Successful rating on a customer service goal resulted from responding within 10 business days and an Outstanding rating resulted from responding within 2 business days with 95% customer satisfaction. OPM's training and guidance make it clear that high quantity and quality are directly related to a rating above Fully Successful.

Forced Distribution of Ratings

5 USC 430 Section 208c states that "The method for deriving and assigning a summary level may not limit or require the use of particular summary levels (i.e., establish a forced distribution of summary levels)." Across the agency, employees were not counseled on their reduction in performance, likely because the supervisors believed their employees did not have a reduction in performance. Therefore, the FY2025 critical element ratings and the overall rating are not truly reflective of performance during FY2025, but rather motivated by pressure from NARA leadership to lower appraisals based on OPM's expectation that there be fewer Highly Successful and Outstanding ratings. Ms. Ridings said as much during the December 9, 2025 managers and supervisors training, stating "OPM provided us guidance that says they expect agencies to begin to normalize performance ratings beginning with the FY25 appraisal cycle, specifically stating they are expecting less level four and less level five ratings." This suggests imposition of a de facto impermissible forced distribution of ratings, despite the Agency's repeated insistence that the changes imposed represented merely a "normalization" of appraisal ratings.

Lack of Performance Counseling Utilizing New Procedures

Under NARA Policy 356, Supplement 1, Part 2, a3c during the mid-year review, rating officials must "Meet with the employee to discuss her or his performance, any changes to the employee's performance standards that may be needed, and any areas needing improvement." It is also expected that the employee's supervisor will provide ongoing feedback throughout the rating period. Training for the Agency's "new lens" for assessing employee performance came three-quarters of the way through the rating period, meaning that many employees had been repeatedly told by their supervisors that they were performing at a Highly Successful or Outstanding level and were never told that they would be rated lower or what they needed to do to achieve a higher than Fully Successful rating. One supervisor noted this exact fact during the December 2, 2025 performance management training session for managers and supervisors: "I did not advise a lot of my employees that, hey, your rating might be lower because of the normalization process, because we didn't learn about this until after midyears."

Damage to Morale

Article 3, Section 5 of the National Agreement acknowledges that there is a link between morale and performance and requires that both the Agency and the Union “consider morale when making decisions regarding conditions of work.” The Agency clearly did not consider morale when making changes to how ratings officials should determine employees’ ratings and craft the narratives.

In a year when the agency has been under a hiring freeze, lost 16% of the workforce, and everyone has been asked to do more, bargaining unit employees have risen to the challenge again and again. Many have taken on additional duties left behind by departed employees, ensuring that the Agency is able to meet organizational goals, only to be told by Ms. Ridings in the December 3rd employee training session that any duties not listed in their position description could not be included in their performance self-narrative. Employees are frustrated, upset, and feel that their work is not acknowledged or valued by the Agency. Improperly assigning a high-performing employee a Fully Successful rating tells them that they should only do the bare requirements of the work they are assigned and not accept duties outside of their position description, whether or not those duties are critical to the success of the Agency’s goals.

Proposed Remedy: That for FY2026, the Agency and all supervisors and managers properly rate employees based on their performance compared to their performance standards; that the Agency provide ongoing, accurate training to all employees in performance management, including an explanation of the ways that the Agency was deficient in assessing employees for FY2025; that supervisors offer the opportunity to all bargaining unit employees to schedule quarterly performance meetings to discuss concrete ways to attain a performance rating above fully successful; and any other appropriate remedy.

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cc: David Castillo, AFGE Council 260