

AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES (AFGE) AFGE Council 238 (AFL-CIO)

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June 5, 2015

Gina McCarthy, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20260

Dear Administrator McCarthy,

As the President of AFGE Council 238, the largest union representing EPA employees (14 AFGE Locals at EPA), I feel compelled to express our dismay at the May 15, 2015 memo issued by Karl Brooks entitled "Working Together to Meet Agency Staffing Target." This memo, which describes a hurried and reactive approach to filling 500 to 800 vacancies in the agency within the next 100 days, will have a devastating impact on current EPA staff and is a further example of the Agency's questionable management practices. A recent Fedweek article, published June 3rd, 2015, "Moving Out, Moving Up (A Guide to the Upcoming Turnover) stated, "The government recognizes that it should be helping employees to move up and that without such preparation the government of the future may flounder."

The memo requires Regions and Offices to:

- Prepare and submit a hiring plan in less than two weeks;
- Consider using a single hiring authority to advertise positions;
- Hire externally as a matter of priority;
- Hire as quickly as possible, using minimal (3 to 5 day) advertisements using various OPM hiring authorities.

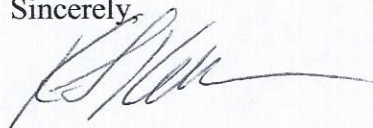
This memo ignores the talent and expertise of the Agency's existing workforce, continuing to lower Agency morale and staff trust in their senior leadership. There are multiple ways in which EPA can help its employees "move up" such as reinvigorating the Upward Mobility program, or tapping its experienced workforce to fill needed vacancies. On April 16, 2015, in testimony submitted to Congress, OARM Deputy Assistant Administrator Karl Brooks quoted you and your Deputy as saying, "...employee engagement should be a top priority because **our workforce is our greatest strength.** [Emphasis added]"

As employees, we are painfully aware of the strain that a reduced workforce has placed on the Agency and its staff, and we fully support the Agency's desire to hire. However, EPA is ill-equipped to move forward effectively due to a lack of a comprehensive workforce analysis. The need for such an analysis was highlighted in a May 28th, 2015 EPA OIG report; "The EPA's program and regional offices have not conducted a systematic workload analysis or identified workforce needs for budget justification purposes; such analysis is critical to mission accomplishment." This same need has been cited by AFGE on multiple occasions, the most recent being the Agency's last rounds of VERA/VSIP offerings, to no avail.

VERA/VSIP plans were approved by OMB and OPM based on proposed restructuring strategies. The Union questions how the May 15th memo is adhering to the above mentioned approved restructuring plans, if at all. It is impossible for anyone, including employees, management and Congress to ascertain any cohesion between the two without the aforementioned workforce analysis. Instead, this memo outlines a reckless and foolhardy hiring approach based on an artificially constructed deadline. Not only is the process outlined unattainable, but is fiscally irresponsible. The newly hired employees will need extensive training to bring them up to speed on Agency processes. Such training will drain an already limited training budget at the expense of current employee needs and contribute to lower morale. This will also further impede the Agency's ability to implement the rules and regulations to the standards being demanded by Congress.

In conclusion, the Union fully supports the Agency in its quest to employ a highly skilled and effective workforce. This is critical to meeting our mission of protecting human health and the environment. However, this should not be at the expense of the existing workforce. Nor should it occur without a workforce analysis. This is human resource management in a vacuum. In the same April 16th testimony to Congress, Deputy OARM AA Brooks also stated "Because approximately three-quarters of the EPA's employees are represented by bargaining units, often with nationally negotiated Collective Bargaining Agreements, the agency ensures that its labor partners are kept informed and engaged in action planning deliberations." Given this statement, AFGE encourages you to reconsider the outlined hiring approach, and engage with your Union partners to develop an equitable and fair initiative for the career growth of EPA's existing employees.

Sincerely,



Karen Kellen
President, AFGE Council 238

cc: Stan Meiburg, Acting Deputy Administrator
Karl Brooks, Acting Assistant Administrator, OARM