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November 25, 2013

The Honorable Katherine Archuleta
Director
U.S. Office of Personnel Management
1900 E Street NW
Washington, DC 20415

Dear Director Archuleta:

As you know, the Senior Executives Association (SEA) represents the interests of career federal executives in government, including those in the Senior Executive Service (SES) and in equivalent positions, such as Senior Level (SL) or Senior Scientific and Professional (ST) positions.

Following the release of this year's Federal Employee Viewpoints Survey (FEVS), we are writing to convey recommendations SEA has developed to improve the survey for future iterations for OPM as well as for the managers and executives who utilize the survey data and OPM reports when engaging their workforce. Our recommendations have been developed following ongoing dialogue with OPM over the past several years, and, in particular, following useful conversations with Dr. Kimya Lee, Manager of Survey Analysis in OPM's Office of Planning and Policy Analysis.

While SEA's concerns about FEVS may have begun with the "senior leadership" section of questions, which we most recently detailed in a May 13, 2013, letter to then-Acting Director Elaine Kaplan, SEA is additionally concerned with the rigid set of questions and definitions within FEVS that may be overly broad and leave little room to deal with current issues. OPM may want to consider refreshing the regulatory framework on the employee survey. Authority to do so exists, according to the proposed rules for FEVS described in the Federal Register on September 16, 2005 (Vol. 70, No. 179).

As you know, the FEVS provides federal executives and managers with a useful, annual snapshot of the perspectives and attitudes of the federal workforce, and OPM promotes the survey as a management tool, with over 13,000 reports delivered this year offering granular insight down to the office level. Given the deep-diving results the survey can offer through effective sampling design, SEA's recommendation is to further break down the definitions under 5 USC 250.301 into more discrete categories.

The definitions of the terms executives, leaders, managers, organization, supervisors, team leaders, and work unit are not necessarily exclusive. For example, Senior Executives are specifically mentioned in two definitions (executives and senior leaders), but due to the nature of their work and responsibility could be thought to be included in as many as four categories (executives, senior leaders, leaders, and managers).

Our recommendations for the definitions of these terms are attached to this letter. While our recommendations may lead to a few more questions being asked, we believe the value executives and managers will obtain from receiving more detailed input from employees about their supervisors, front line managers, middle managers, executives, and political leadership will outweigh the burden to respondents. Furthermore, clarity about whom respondents are thinking when answering certain questions would increase, amplifying the usefulness of the broad survey and office-level reports.

An additional concern that we would like to raise is the desire by some departments and agencies to utilize FEVS data as a possible ratings component in individual performance plans for executives and managers. Given the aforementioned definitional problems, in addition to the fact that the survey is meant to be a snapshot of the workforce to be used as a management tool, tying performance ratings to survey responses that can be influenced by exogenous factors, such as congressional rhetoric, sequester-induced employee furloughs, or a government shutdown, seems ill-advised. We caution OPM from allowing agencies to pursue this path.

In addition to potential regulatory fixes, SEA offers its assistance in securing congressional support for legislative improvements to the law (P.L. 108-136) that dictates agencies conduct an annual employee survey. In particular, SEA understands that OPM is hindered in altering questions asked in the FEVS because language in the base law states that OPM will “prescribe” a set of questions. While locking-in the survey questions does provide stability and comparability of results over time, it may preclude certain critical and timely questions from being included in the survey, as needed.

Thank you for consideration of our concerns and recommendations. We hope to work closely with OPM to improve the FEVS, knowing that in doing so improved insight into employee perspectives can help executives and managers better engage their employees and advance the civil service.

Sincerely,



CAROL A. BONOSARO
President

Enclosure (2)



SEA Recommendations for Improving Definitions of Terms Used in the Federal Employee Viewpoint Survey (FEVS)

The Senior Executives Association (SEA) recommends that the Office of Personnel Management (OPM) conduct a careful review of current code, regulation, and agency materials to identify instances where terminology used in the FEVS definitions (5 USC § 250.301) is utilized and to ensure consistency with those definitions and those included in the survey. For example:

- 5 USC § 7103 provides definitions for several terms used in the FEVS:
 - “supervisor” means an individual employed by an agency having authority in the interest of the agency to hire, direct, assign, promote, reward, transfer, furlough, layoff, recall, suspend, discipline, or remove employees, to adjust their grievances, or to effectively recommend such action, if the exercise of the authority is not merely routine or clerical in nature but requires the consistent exercise of independent judgment, except that, with respect to any unit which includes firefighters or nurses, the term “supervisor” includes only those individuals who devote a preponderance of their employment time to exercising such authority.
 - “management official” means an individual employed by an agency in a position the duties and responsibilities of which require or authorize the individual to formulate, determine, or influence the policies of the agency.
- The General Schedule Supervisory Guide ([OPM, 1998](#)) also provides definitions of positions used in the FEVS:
 - SUPERVISOR - A position or employee that accomplishes work through the direction of other people and meets at least the minimum requirements for coverage under this Guide. Those directed may be subordinate Federal civil service employees, whether full-time, part-time, intermittent, or temporary; assigned military employees; non-Federal workers; unpaid volunteers; student trainees, or others. Supervisors exercise delegated authorities such as those described in this guide under Factor 3, Supervisory and Managerial Authority Exercised. A **first level supervisor** personally directs subordinates without the use of other, subordinate supervisors. A **second level supervisor** directs work through one layer of subordinate supervisors. A "full assistant" shares fully with a

higher level supervisor in all phases of work direction, contractor oversight, and delegated authority over the subordinate staff. When work for which the supervisor has technical oversight responsibilities is contracted out, or considered for contracting in lieu of accomplishment by subordinates, the supervisor's responsibilities may include: analyzing, justifying, comparing cost, and recommending whether work should be contracted; providing technical requirements and descriptions of the work to be accomplished; planning the work schedules, deadlines, and standards for acceptable work; arranging for subordinates to inspect quality or progress of work; coordinating and integrating contractor work schedules and processes with work of subordinates and others; deciding on the acceptance, rejection, or correction of work products or services, and similar matters which may affect payment to the contractor.

- MANAGERIAL - The authority vested in some positions under the General Schedule which direct the work of an organizational unit, are held accountable for the success of specific line or staff functions, monitor and evaluate the progress of the organization toward meeting goals, and make adjustments in objectives, work plans, schedules, and commitment of resources. As described in 5 U.S.C. 5104, such positions may serve as head or assistant head of a major organization within a bureau; or direct a specialized program of marked difficulty, responsibility, and national significance.

SEA believes that conducting a review of terminology will be useful in determining an improved and more consistent set of definitions.

SEA would also like to offer several suggestions which may help improve the definitions included in the survey.

- The current definition of Executives is “members of the Senior Executive Service or equivalent.” We believe that Executives should be broken into two categories – political and career. Such a distinction would provide more insight into which Executive employees survey respondents are thinking about when answering the survey.
- The current definition of Leaders is “an agency’s management team. This includes anyone with supervisory or managerial duties.” This is perhaps the vaguest definition used in the FEVS. Are respondents meant to think of an agency’s senior leaders, such as the Secretary, Deputy Secretary, etc. or are they to consider all employees with leadership duties, from the Secretary down to front line supervisors. If it is the later, this definition is overly broad, as perspectives about a singular link in the leadership chain could color the survey response for Leaders questions.
 - Compounding the confusion of the Leaders term is the phrase “senior leaders” used in survey questions but not included in the definitions. We recommend defining this term and using that definition to draw distinction between these two categories.

- FEVS includes definitions for “Managers” and “Supervisors,” yet there are often multiple layers of these within organizations. We believe creating distinct definitions and questions for various levels of managers and supervisors (ie. First line, Second line, etc.) would provide more useful and actionable feedback in survey responses.
- A way to improve clarity about which positions respondents are meant to think about when answering survey questions would be to provide examples of types of positions and employee levels in the examples provided with the definitions. For example, managers are typically GS 13-15, and indicating the general grade levels with certain positions may help clarify for respondents who they are answering particular questions about.
 - Technology may exist that allows OPM and agencies to use information about organizational structure and hierarchy within offices or programs in determining exactly which employee positions are present (including which supervisory, managerial, and other leadership positions are present). If that is the case, office level surveys could be specifically tailored more effectively, thereby providing more precise survey data.

While these recommendations and suggestions are not exhaustive, we do believe they raise appropriate areas for improvement and potential pathways for addressing issues as identified by SEA. We seek to be collaborating partners in what will likely be an iterative process as ways to improve the FEVS are explored.