In the know with…

Employee Relations

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OHRM Employee Relations & Performance Management

NEWSLETTER

The Place Where the ER Practitioners Go to Be In the Know

A Fond Farewell to Jan Sneed!

The ER&PMS is bidding farewell to Jan Sneed, one of our senior Employee Relations Specialists. After a long and distinguished Federal career, Jan will be retiring on October 31st. She began her Federal career in 1975 with the Defense Department. In 1993, Jan began her career with VA at the Memphis medical center working in EEO. She became an Employee Relations Specialist at that facility in 1997 where she served with distinction and established herself as a top flight specialist who occasionally performed work for her VISN as well as assisting ER&PMS on national projects. In June of 2012, Jan joined the ER&PMS team where she immediately became a valued employee as the ER&PMS and its customers benefitted greatly from her experience, dedication and wealth of knowledge. The Director of ER&PMS has received numerous notes of praise from colleagues that expressed their appreciation of Jan's customer service and sound guidance. Although the ER&PMS will miss her, we wish her the best!

BURDEN OF PROOF

In our July/August 2015 newsletter under "Reminders and Updates," we briefly mentioned the report issued by the Merit Systems Protection Board (MSPB) in August 2015, regarding adverse actions. The report outlined several authorities/tools available to managers to assist in dealing with problem employees. However, after surveying Federal managers about their use of these tools, it was determined that managers are not properly utilizing them.

As part of the survey, one of the questions asked of Federal managers was: "What standard of proof they used when deciding to propose or implement removal actions." As a reminder, adverse actions under Chapter 75 include: removal, suspension of more than 14 days, reduction in grade, reduction in pay and furloughs of 30 days or less. (Continued on pg. 9)

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59 Minutes – Is It An Award or Isn't It?

OHRM ER&PMS and the Office of Oversight and Effectiveness have been reminding management and Human Resources for many years that VA Handbook 5017 requires that the minimum amount of time off that can be granted due to a contribution made to the government by an employee is four hours (eight hours for full-time physicians.) Additionally, management must justify the award and document it using VA Form 4659. Unfortunately, despite the clear language in policy, we have consistently had to remind management and HR offices that the granting of 59 minutes as a form of an award or recognition is not in accordance with VA's award policy.

Additionally, the proverbial use of 59 minutes originates under the provisions of VA Handbook 5011, which addresses brief periods of tardiness, not as a form of recognition. Here is what the Handbook says:

f. **Tardiness or Brief Periods of Absence.** An unavoidable or necessary absence from duty and tardiness of less than 1 hour may be excused when the reasons for the absence appear to be adequate to the leave approving official. Unexcused absences or tardiness may be handled by either:

(1) Allowing the employee to use earned compensatory time, annual leave, or LWOP to cover the period of the absence. However, in this case, if the leave charge exceeds the period of absence, the employee will not be required to work during the period covered by leave.

(2) Charging the time absent to AWOL.

OHRM Worklife has stated in the past that to justify excusing an employee from work without charge to leave (e.g. 59 minutes) for reasons other than tardiness, management must apply the following provision from VA Handbook 5011, Part III, Chapter 2, Paragraph 12(a):

12. AUTHORIZED ABSENCES

a. **General.** An employee may be given authorized absence without charge to leave when:

(1) The activity is considered to be of substantial benefit to VA in accomplishing its general mission or one of its specific functions, or

(2) The activity will clearly enhance an employee's ability to perform the duties of the position presently occupied or may be expected to prospectively occupy, or

(3) The basis for excusing the employee is fairly consistent with prevailing practices of other Federal establishments in the area concerning the same or similar activities.

If using the aforementioned provision, management is not limited to granting AA in increments of 59 minutes but must be able to justify the granting of AA under Paragraph 12(a)(1) **or** (2) **or** (3). The agency would not be able to call it an award, or grant it as a form of recognition, because such use would be inconsistent with VA Handbook 5017 as it is less than 4 hours of time off and is not processed as an award.

For the reasons stated above, granting 59 minutes as a gift, in recognition of someone's birthday or as a reward for a job well done is inconsistent with VA policy.

Management Directed Reassignment – Revisited

Everything Old is New Again

In a March/April 2014 newsletter article entitled *Rules of the Game Have Changed for Directed Reassignments,* we described a then-new test for management directed reassignments from *Miller v. Department of the Interior*, 2013 MSPB 94 (December 6, 2013) (*Miller III*). The Merit System Protection Board's (MSPB or the Board) ruling in that case has been overturned because the U.S. Court of Appeals for the Federal Circuit (the Court) issued a decision on September 2, 2015, reversing the ruling of the full Board and reinstating the Administrative Judge's (AJ) Initial Decision. See *OPM v. Miller, MSPB,* 2014-3101 (September 2, 2015).

This case has had a convoluted life. Ms. Miller was removed from her position as Park Superintendent effective August 6, 2010, for refusing a management directed reassignment from Sitka to Anchorage, Alaska. Ms. Miller appealed and, following a hearing, the AJ sustained the agency's action, applying the framework established in *Ketterer v. Agriculture*, 2 MSPR 294 (1980) and *Umshler v. Interior*, 44 MSPR 628 (1990). In *Ketterer*, the Board held that the agency has the burden of demonstrating that the reassignment promotes the efficiency of the service, management had a legitimate reason for the reassignment, and the employee was given adequate notice of the reassignment but refused to accept it. In *Umsherler*, the Board explained that the appellant has an opportunity to rebut management's claim that the reassignment was legitimate and the Board "may conclude that it was not a valid discretionary management determination, but was instead either an improper effort to pressure the appellant to retire, or was at least an arbitrary and capricious adverse action."

The Board took up the case on appeal by Ms. Miller and reversed the AJ's decision, thus overturning the appellant's removal. (See *Miller v. Interior*, 2013 MSPB 27 (April 3, 2013) (*Miller I*).) In *Miller I,* the Board specifically discarded the shifting-proof framework described in *Ketterer* and *Umsherler*, and applied a single efficiency-of-the-service criterion.

The Board then revisited its *Miller I* decision on its own motion, vacated the original decision and substituted a new decision, *Miller v. Interior*, 2013 MSPB 35, (May 13, 2013) (*Miller II*). The new decision sought to clarify and better explain the Board's determination to discard the earlier analysis provided in *Ketterer* and *Umsherler*. Then the Director of the Office of Personnel Management exercised the option under 5 U.S.C. §7703(d) to petition the Board to reconsider its May 13, 2013 decision (Miller II). The Board denied the petition, affirmed *Miller II*, but with modifications in *Miller v. Interior*, 2013 MSPB 94 (December 6, 2013)(*Miller III*).

OPM was still dissatisfied so it petitioned the U.S. Court of Appeals for the Federal Circuit to review the Board's decision. The Court, finding that the earlier framework articulated in *Ketterer* and *Umshler* had been adopted as "law of the circuit" in *Frey v. Dept. of Labor*, 359 F.3d 1355, 1360 (Fed. Cir. 2004), determined that unless overruled by the court *en banc,* an intervening statutory change, or Supreme Court decision, *Ketterer* must be followed.

The Court reversed the Board, finding that the AJ applied the correct framework, and reached an appropriate conclusion – the agency established by a preponderance of the evidence that it had a legiti-

Management Directed Reassignment – Revisited , Continued...

mate management reason for the reassignment and the appellant did not successfully rebut the agency's prima facie case. The Court overturned the Board's decisions (Miller I, II, and III) that vacated the AJ's initial decision and also instructed the Board "to instate the Initial Decision as the final decision of the Board."

While all three appellate judges concurred with the decision, there was a dissent worth noting. In his dissent, Judge Wallach took issue with the manner in which the agency decided that it must reassign Ms. Miller, calling the agency's conduct "reprehensible." However, as the objectionable issues (the factual findings and the credibility determinations made by the AJ) were not presented as part of appeal, the Court was unable to rule on them. Nonetheless, ER practitioners should pay attention to the issues pointed out in the dissent when advising management regarding a management directed reassignment and potential outcomes because Judge Wallach believed that the evidence demonstrated dishonesty on the part of the agency in regards to the manner in which the appellant was selected for the position.

Despite the five year history of this case, and a 24-page opinion including the 2-page dissent, we ended up back where we started. The analyses in *Ketterer* and *Umshler* are controlling case law for appealing removals due to failure to accept a management directed reassignment. Management's decision to reassign must be based on legitimate management reasons; the employee must be given notice of the reassignment; and refuse the reassignment when taking an adverse action for failure to accept a management directed reassignment. On appeal, the agency must make a prima facie showing as to its legitimate management reasons. Then the employee has an opportunity to rebut to show that the reassignment had no solid or substantial basis in personnel practice or principle.

RENEWAL OF LICENSE AFTER EXPIRATION – WHAT ARE THE CONSEQUENCES?

In previous newsletter articles, we have addressed the process to follow when an employee fails to maintain a full and unrestricted license, registration or certification as required by 38 U.S.C 7402(b) or VA Handbook 5005. What we have not previously addressed is what action can be taken when a Title 38 employee allows his/her license to expire, performs his/her job duties while his/her license is expired, and successfully renews the license prior to management becoming aware that it had expired.

The procedures outlined in VA Handbook 5021, Part VI, paragraph 10 are not applicable in this scenario because the policy only allows management to effect the immediate removal of a Title 38 employee during the time period in which he/she does not meet a statutory or regulatory requirement, e.g. failure to maintain a full, active and unrestricted license. If management does not become aware that there was a lapse in licensure until after it has been renewed, the tenants of this provision are not met because the Title 38 employee now meets the statutory or regulatory requirement for employment.

So what can a facility do? This depends upon the nature of the Title 38 employee's appointment as outlined below:

Probationary Title 38 employee: If the Title 38 employee is serving a probationary period in

RENEWAL OF LICENSE AFTER EXPIRATION , Continued...

accordance with the provisions of 38 U.S.C. 7402 and VA Handbook 5005, then management may elect to convene a Professional Standards Board (PSB) to conduct a summary review to determine if continued employment is appropriate. This process is only used if management determines that a probationary employee's performance or conduct warrants removal. If the supervisor does not feel that the infraction is sufficient to warrant termination, he/she may issue an admonishment or reprimand. (See VA Handbook 5021, Part III, Chapter 1 for information regarding summary reviews by PSBs and Paragraph 4 in that part for information regarding other appropriate penalty actions.)

Title 38 employee appointed under 38 U.S.C. 7405, excluding part-time RNs: If the Title 38 employee has been appointed under the provisions of 38 U.S.C. 7405, excluding part-time RNs, then he/she is an "at will" employee and may be separated at any time for non-discriminatory reasons. Therefore, a termination letter could be issued under these provisions, which are covered in VA Handbook 5021, Part VI, Paragraph 15.

Permanent Title 38 employees: For those permanent Title 38 employees that are no longer serving a probationary period, the "standard" process for taking a disciplinary or major adverse action for misconduct are used. These provisions are outlined in VA Handbook 5021, Part II, but require due process, e.g. advance notice, right to review evidence, right to reply, etc.

Part-time RN appointed under 38 U.S.C. 7405: A part-time RN appointed under 38 U.S.C. 7405 that has not completed two-years of VA service on a Title 38 appointment may only be separated under the provisions applicable to probationary Title 38 employees. Those part-time RNs that have previously completed a Title 38 probationary period are entitled to due process as prescribed in VA Handbook 5021, Part II.

Unfortunately, many HR Specialists fail to understand that the provisions of VA Handbook 5021, Part VI, paragraph 10 are only applicable at the time that the agency confirms that the Title 38 employee does not have an active, full and unrestricted license. If the individual has his/her license, registration, or certification renewed prior to the deciding official's signature on a notice of termination with an exact date and time of separation, then it is too late to terminate the individual using this provision and only the provisions listed above may be used.

Please note that this article should in no way lead a facility to believe that it is appropriate not to have a process in place for ensuring that those individuals required maintaining licensure, registration or certification is maintained. Each facility is required to ensure that these individuals meet the qualifications for employment and appropriate action is taken immediately upon determining that the individual does not meet this requirement.

Drafting Proposal/Decision Letters

Adding Extra Details after the Charges Makes the Letter Stronger, Right??

When drafting proposal/decision letters for disciplinary/adverse/major adverse actions, have you ever been tempted to add extraneous information because you thought by doing so it would make the action seem stronger? While it might be tempting to do this, it should be avoided because doing so does not make your letter any more powerful. In fact, it might cause the agency to lose a case because the extraneous details gave a 3rd party something extra to consider as to whether the agency proved its case. Proposal and decision letters should adhere to the often-used phrase of "K.I.S.S." which we like to say stands for "Keep It Simple *Specialist!*" Let's review a couple of actual letters issued to employees at the VA, and see how they could be problematic. (Details have been slightly changed to avoid identifying actual employees/facilities.)

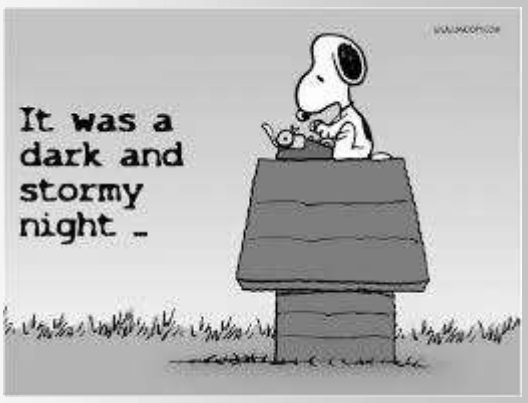
Our first scenario involves a physician who was placed on a Focused Professional Practice Evaluation (FPPE) for cause, the end result being the facility's Medical Staff Executive Committee recommended revocation of his privileges. The resulting proposed removal and revocation of privileges letter read, in part, as follows:

> *It is proposed to remove you from federal service and revoke your clinical privileges for the following reasons:*
>
> *Charge: Failure to adequately assess a patient*
>
> *On June 30, 2015, you received a view alert on a 59 year-old veteran patient stating the patient had an abnormal chest x-ray. As of July 30, 2015, there was no documentation that the patient had been contacted with the results of his x-ray, and no orders or consults were entered.*

The proposal letter continues with several more incidents of the physician's poor assessment of patients. At the conclusion of the charges section of the letter, the following paragraph was inserted:

> *It is noted from the time period April 3, 2015 – July 15, 2015, you used 14 days of sick leave. Also of note, is that when asked if you had a medical condition which might be the underlying cause of your poor performance, you replied you have not felt well; however, you did not ask for any accommodation.*

The additional paragraph should not have been included in the proposed removal and revocation of privileges letter. It does not add value to the overall purpose of the letter, which is to put the employee on notice as to why his removal and revocation of privileges is being proposed, and the aggravating factors that relate to the selected penalty. There may be some truth to these additional facts, but they do not belong in the letter, and in this example, raise concerns that the facility may consider this employee to be disabled, which creates a greater opportunity for the employee to establish a *prima facia* case of discrimination. Don't give a 3rd party extraneous information to focus on other than whether you proved your charges, and whether the selected penalty is within the range of reasonableness based on the sustained charges and Douglas Factors.



Drafting Proposal/Decision Letters, Continued…

A second example is regarding an employee who had been experiencing conduct problems for the past several years. His supervisor had never issued him any disciplinary action; however, he was previously put on notice of his inappropriate behavior through a Written Counseling in January 2013. The Written Counseling letter also documented that the facility provided him with a copy of its local policy entitled, "Conduct and Ethics." Subsequently, in July 2015, he was involved in a verbal altercation with his supervisor, and acted in an inappropriate manner in the presence of co-workers and patients. The charge for the proposed suspension was drafted as follows:

CHARGE: Inappropriate Conduct

On July 7, 2015, you were involved in a verbal altercation with your supervisor, John Smith. This altercation took place on the 7th Floor, East Wing in the presence of other co-workers, and patients. Mr. Smith approached you and asked you to step into his office because he needed to discuss a project he was going to assign to you. You told Mr. Smith you were too busy to go to his office, and that he needed to find someone else to be in charge of the project. Mr. Smith again asked you to step into his office, and this time you said in a very loud voice, I told you I did not have time to talk to you or words to that effect. Your conduct was inappropriate and will not be tolerated.

No problem with the charge, however, the facility decided to continue by adding an additional paragraph after the charge that read:

Your behavior has been intolerable for the last two years. You previously acted in an insubordinate manner towards your supervisor when he approached you about completing a project. You used profanity and became enraged to the point that VA Police had to be called. Additionally, you have displayed inappropriate conduct towards your co-workers who have raised multiple complaints about your behavior. Your actions will no longer be tolerated, and if your misconduct continues, you will be subjected to further disciplinary action.

Looking at this added paragraph, it appears the facility became so frustrated with the employee's behavior it decided to add the extra paragraph to let him know just how really "bad" he had been. Since these additional incidents of misconduct were not labeled with a separate charge/specification, the additional paragraph should not have been included in the letter. If the facility was trying to show the employee had been previously warned about his inappropriate behavior through the Written Counseling issued to him in January 2013, it could have included this information in its Douglas Factor analysis for factor number 9, "the clarity with which the employee was on notice of any rules that were violated in committing the offense, or had been warned about the conduct in question." Including information about him receiving a Written Counseling in January 2013 in the aggravating factors paragraph of the letter would have clearly shown the employee has been warned about his inappropriate behavior in the past. A sentence in this paragraph could have looked something like:

You were put on notice in January 2013 that this type of behavior would not be tolerated, and you were issued a copy of the medical center's local policy entitled, "Conduct and

Drafting Proposal/Decision Letters, Continued…

Ethics." Therefore, you were clearly on notice of the manner in which the facility expected you to conduct yourself in the workplace.

One final example involves including extra information in a specification that can result in changing the nature of the charge and making the misconduct more difficult to prove.

CHARGE: Negligence in Performance of Nursing Duties

On June 15, 2015, you were instructed by Dr. Dogood to take Veteran A to Urgent Care, and to call ahead and inform the nursing unit that the patient being sent would need IV fluids administered immediately upon arrival. You told Dr. Dogood that you were on your way to your lunch break and needed to go immediately because you had not yet had a break. You then went into the break room and closed the door. Your actions constitute patient abuse in that you intentionally disregarded the patient's needs for immediate care. Your conduct and behavior was inappropriate and will not be tolerated. As a result of your negligence, patient care was compromised and the safety of these patients was put at risk. This type of behavior and conduct will not be tolerated.

Although the facility identified the charge as negligence in the performance of nursing duties, the language contained in the specification indicated that the misconduct "constitute[ed] patient abuse" and "patient care was compromised and the safety of these patients was put at risk." The facility charged the employee with negligence, which is defined as a failure to take proper care in doing something, so all it needed to demonstrate was that she failed to take proper care to perform a job duty. There was no need for the facility to add the language regarding patient abuse, because she was not charged with patient abuse. Adding this raises an extra burden to also prove that the negligence met the definition of patient abuse or that this patient's care was compromised and the safety of patients (what other patients were involved?) was put at risk. Again, this extra unnecessary wording will result in a 3rd party having to determine whether the charge – negligence, patient abuse and compromising patient safety -- is supported by the evidence versus determining the severity of the penalty, which is what this additional information was really attempting to qualify.

Adding unnecessary information in your proposal and decision letters is – unnecessary. The applicable statutes, regulations, VA Policies, and applicable bargaining unit agreements outline the requirements regarding what these letters must contain, and HR Specialists should adhere to them. Of course, you will want to tailor the letters to each employee's specific circumstances, ensuring he/she is clearly on notice of what is being charged, and what aggravating factors were taken into consideration when the proposing official selected a penalty, as well as what aggravating/mitigating factors were used by the deciding official in making his/her decision. But adding extraneous information may be detrimental to the facility, and may add additional burdens on the facility when proving its case before a 3rd party. Please visit the OHRM ER&PMS website at: http://vaww.va.gov/OHRM/EmployeeRelations for sample letters which can be used when drafting proposal/decision letters for Title 5, Hybrid Title 38, and Title 38 employees.

BURDEN OF PROOF, CONTINUED...

MSPB reported the following:

Standard of Proof	Proposed Removal	Decided Removal
Beyond a reasonable doubt	90%	84%
Highly likely	7%	10%
More likely than not	3%	5%
Reasonable person could conclude.	1%	1%

Let's look at what each of the standards of proof listed above measures:

Beyond a reasonable doubt: This standard is known as one of the highest standards of proof. Meaning that there could be no other logical explanation derived from the evidence except that the employee is guilty of the crime. This standard is normally exclusive to **CRIMINAL CASES**.

Clear and convincing /highly likely: This standard is known as the medium level standard of proof. According to 5 CFR 1209.4 (e) Clear and convincing is: *"That measure or degree of proof that produces in the mind of the trier of fact a firm belief as to the allegations sought to be established."* In plain language, the Agency is required to present evidence that proves their case is highly probable to be true than not true. This is a higher standard than "preponderance of the evidence," but less than "beyond a reasonable doubt." You will normally see this standard applied in **WHISTLEBLOWER CASES**. In a whistleblower case this standard of proof requires that the Agency prove that it would have taken the same action in the absence of whistleblowing.

Preponderance of the evidence, also known as the **"more likely than not standard."** According to 5 CFR 1201.56 (c)(2), Preponderance of the evidence is: *"The degree of relevant evidence that a reasonable person, considering the record as a whole, would accept as sufficient to find that a contested fact is more likely to be true than untrue."* This standard has less of a degree of proof than that of the "beyond a reasonable doubt" and "clear and convincing" standard, however, it has a higher degree of proof than "substantial evidence." This standard requires that the agency have enough evidence to support their charges by a margin of about 51%. As will be discussed further, this is the standard required by agencies for taking actions for reasons of **MISCONDUCT** under Chapter 75.

Substantial evidence/Reasonable Person could conclude: This standard is known to be one of the lower standards of proof. According to 5 CFR 1201.56 (c)(1), Substantial evidence is: *"The degree of relevant evidence that a reasonable person, considering the record as a whole, might accept as adequate to support a conclusion, even though other reasonable persons might disagree."* This is a lower standard of proof than preponderance of the evidence. This standard would normally apply if an employee received an adverse action under 5 U.S.C. 4303 for **PERFORMANCE**-based reasons.

Now, back to MSPB's report and what the appropriate standard of proof for taking an adverse action is under Chapter 75. MSPB's report reflects that only 3% of proposing officials and 5% of deciding officials were using the ap-

BURDEN OF PROOF, CONTINUED...

propriate standard of proof, which is the *more likely than not* standard according to 5 CFR 1201.56(ii). Based on the results of the survey, 90% of proposing officials and 84% of deciding officials chose "beyond a reasonable doubt" as the required standard of proof for adverse actions, which is actually a criminal standard and clearly much harder to prove.

Specifically, 5 CFR 1201.56 – Burden and degree of Proof:

> *Agency:* Under 5 U.S.C. 7701(c) (1), and subject to the exceptions stated in paragraph (b) of this section, the agency action must be sustained if:
>
> **(i) I**t is brought under 5 U.S.C. 4303 or 5 U.S.C. 5335 and is supported by substantial evidence; or
>
> **(ii) I**t is brought under any other provision of law or regulation and is supported by a preponderance of the evidence.

In summary, as an Employee Relations practitioner, it is important that you know and understand what standard of proof is required when taking an adverse action under Chapter 75 or under Chapter 43. More importantly, it is vital that you share this information with your proposing and deciding officials so that they have a better understanding of the process.

It is our hope that the next time MSPB conducts a survey and asks our Federal managers about the appropriate standard of proof for an adverse action, 100% of them answer: "Preponderance of evidence."

You can find MSPB's full report here:

http://www.mspb.gov/netsearch/viewdocs.aspx?doc-number=1205509&version=1210224&application=ACROBAT

Contact Us!

Employee Relations & Performance Management Service (051)

Below is a list of the staff of the OHRM Employee Relations & Performance Management Service. In order to assist you in obtaining a timely response to your inquiries, we ask that you first attempt to consult with the primary point of contact (POC) listed for your work region. However, if your POC is out of the office, or if you need an immediate response and are unable to reach this person, please contact another staff member or team leader.

NAME	TITLE	TELEPHONE NUMBER
Larry Ables	Director	(202) 461-6172
Elizabeth Hill	Team Leader	(706) 504-3988
Jennifer (Bauer) Hayek	Team Leader	(216) 466-7397
Sheila Caldwell	Human Resources Assistant	(202) 461-5983

ER SPECIALIST	PHONE NUMBER	VISN	VBA REGION	NCA MSN
LeTricia Jackson	(202) 461-7988	1, 2, 3, 12, 15	Western	Denver
Bridgette Longino-Thomas	(216) 288-0524	5, 10, 11, 17	Central	Oakland
Terri McVay	(205) 655-4128	6, 7, 16, 21	Southern	Philadelphia
	Contact any Specialist	4, 9, 18, 20	Eastern	Atlanta
Philip Works	(202) 425-8342	8, 19, 22, 23	Eastern	Indianapolis

NAME	HOURS OF WORK	CWS DAY	8-HOUR DAY
Ables, Larry	8 a.m. to 5:30 p.m. (EST)	2nd Monday of pay period	1st Friday of pay period
Hill, Elizabeth	7 a.m. to 4:30 p.m. (EST)	1st Monday of pay period	2nd Friday of pay period
Hayek (Bauer), Jennifer	8:30 a.m. to 6 p.m. (EST)	1st Friday of pay period	2nd Friday of pay period
Caldwell, Sheila	6:30 a.m. to 4 p.m. (EST)	2nd Monday of pay period	1st Friday of pay period
Jackson, LeTricia	7:30 a.m. to 4:00 p.m. (EST)	—	—
Longino-Thomas, Bridgette	7:00 a.m. to 4:30 p.m. (EST)	2nd Friday of pay period	2nd Thursday of pay period
McVay, Terri	6:30 a.m. to 4 p.m. (CST)	2nd Friday of pay period	1st Friday of pay period
Sneed, Jan	Retired effective 10/31/2015	Retired effective 10/31/2015	Retired effective 10/31/2015
Works, Philip	7:30 a.m. to 4:00 p.m. (EST)	—	—

Check Us Out on the Web!

Visit our website for information and guidance regarding the management of Title 5 and Title 38 disciplinary, performance management, and awards and recognition programs. Our web site contains sample letters, advisory services, access to MSPB decisions, and links to VA regulations for quick access to all your employee relations questions.

Questions or comments regarding the content of this newsletter can be directed to any ER&PMS team member.

Our Website Address:
http://vaww.va.gov/OHRM/EmployeeRelations/

Our NEW Fax:
(202) 495-5200

Get Our Newsletter!

To be added to the VHA ER/LR mail group, please contact

Christine Massey

Christine.Massey@va.gov