

**DEPARTMENT OF DEFENSE**  
**PRIORITY PLACEMENT PROGRAM (PPP)**



**PPP ASSESSMENT GUIDE**

**Civilian Personnel Management Service (CPMS)**  
**July 2005**

(This page intentionally left blank.)

**PPP ASSESSMENT GUIDE**  
**TABLE OF CONTENTS**

	<u>Page</u>
CHAPTER 1 – INTRODUCTION	3
C1.1. PURPOSE	3
C1.2. PHILOSOPHY AND OBJECTIVES	3
C1.3. AUTHORITY	4
C1.4. CARE COORDINATOR STRUCTURE	4
CHAPTER 2 – PPP ASSISTANCE VISITS	6
C2.1. TYPES OF PPP ASSISTANCE VISITS	6
C2.2. PRE-REVIEW CHECK	7
C2.3. PRIMARY AREAS OF ASSESSMENT	7
CHAPTER 3 – REVIEW METHODOLOGY	12
C3.1. HOW TO SURVEY	12
C3.2. SAMPLE SELECTION	12
C3.3. TRAINEE AND POSITION REENGINEERING ACTIONS	12
C3.4. QUESTIONABLE ACTIONS	13
C3.5. INTERNAL PRACTICE REVIEW	13
CHAPTER 4 – GAINING ACTIVITY PROCESS	15
C4.1. MATCHING PERSONNEL ACTIONS	15
C4.2. THE PROCESS	15
C4.3. THINGS TO WATCH	15
C4.4. COMPLIANCE AND PROGRAM SUPPORT ASSESSMENT	16
C4.5. INTERROGATION	16
CHAPTER 5 – REGISTERING ACTIVITY PROCESS	17
C5.1. GENERAL	17
C5.2. PROGRAM ELIGIBILITY	17
C5.3. QUALIFICATIONS	17
C5.4. PERFORMANCE AND CONDUCT	17
C5.5. OTHER REGISTRATION DATA	18
C5.6. TIMELINESS	18
C5.7. RETAINED GRADE PROGRAM (PROGRAM R)	19

CHAPTER 6 – PROGRAM REVIEW FINDINGS AND CORRECTIVE ACTIONS	20
C6.1. GENERAL	20
C6.2. CORRECTIVE ACTIONS	21
C6.3. RECONSTRUCTION	21
CHAPTER 7 – EVALUATION REPORTS AND FOLLOW-UP	23
C7.1. REPORTING	23
C7.2. PROGRAM REVIEW RATINGS	23
C7.3. FOLLOW-UP	23
CHAPTER 8 – STAFF ASSISTANCE	24
<u>APPENDIX</u>	<u>25</u>
AP1. EVALUATION CHECKLIST	25

## C1. CHAPTER ONE

### INTRODUCTION

#### C1.1. PURPOSE

C1. 1.1. This guide provides a course of action to assess compliance with the policies, procedures, and intent of the Department of Defense (DoD) Priority Placement Program (PPP). This guide does not establish policy. The reasons for assessing the PPP are the same as those for conducting any other systematic evaluation – to determine whether the objectives of the Program are being achieved in the most efficient and effective manner and, if not, to propose or direct changes needed to improve the operation of the Program.

C1. 1.2. These guidelines are structured to:

C1. 1.2.1. Provide evaluators a comprehensive procedure to plan and conduct reviews;

C1. 1.2.2. Provide uniform review methodology, interpretation, and analysis;

C1. 1.2.3. Serve as a guide for on-the-job training of human resources (HR) specialists and self-review by HR officers and staff; and

C1. 1.2.4. Provide quality control for the PPP.

C1. 1.3. These guidelines are not all inclusive, but their use can serve to assess compliance, identify violations, and isolate problems, including systemic problems that cause errors or negatively affect placements. They are designed for use by those engaged in a review, to include Civilian Assistance and Re-Employment (CARE) Program Coordinators, DoD Components, and HR staffs.

#### C1.2. PHILOSOPHY AND OBJECTIVES

C1.2.1. The purpose of the PPP is to place well-qualified DoD employees affected by changing resources requirements (e.g., reductions-in-force (RIF), realignments, transfers of function (TOF), reorganizations, base realignments and closures), in continuing DoD positions. A key objective in any PPP review is determining whether appropriate placements and actions are being made through the Program. Reviews are, therefore, primarily oriented toward assessing program results rather than determining whether minimal program requirements have been met.

C1.2.2. The principal review objectives are to:

C1.2.2.1. Ensure proper application of all statutory and regulatory requirements governing the Program;

C1.2.2.2. Assess how well activities are executing delegated program management authority;

C1.2.2.3. Provide a basis for determining changes necessary to ensure proper program operation;

C1.2.2.4. Inform the Components of program operation issues;

C1.2.2.5. Appraise the quality of program guidance and assistance provided activities by their Components and commands;

C1.2.2.6. Ensure uniform application of PPP policies and procedures throughout DoD and recommend changes in regulations, procedures, and programs to meet changing needs;

C1.2.2.7. Provide advisory HR management services to DoD activities; and

C1.2.2.8. Serve as a clearinghouse for innovative HR methods and innovative best practices.

### C1.3. AUTHORITY

C1.3.1. The basic authority for the PPP is DoD Instruction 1400.20, dated September 26, 2006. The authority to conduct reviews and the requirement for internal reviews is provided in DoD Instruction 1400.20 and DoD 1400.25-M, dated December 3, 1996, Civilian Personnel Manual (CPM) Subchapter 1800, authorized by DoD Directive 1400.25, dated November 25, 1996.

C1.3.2. These guidelines do not substitute for the authority contained in DoD 1400.25-M, CPM Subchapter 1800. They are used to review and assess the PPP, and as a training reference for new employees assigned program responsibilities.

C1.3.3. The CARE coordinator structure accomplishes its quality control and program development responsibilities by conducting on-site reviews and special studies.

### C1.4. CARE COORDINATOR STRUCTURE

C 1.4.1. The CARE coordinator structure, outlined in CPM Subchapter 1800, consists of the:

C1.4.1.1. DoD CARE Division Deputy Director for Operations and seven CARE Program Coordinators. They are responsible for providing guidance, evaluating program administration, conducting formal training, providing instructions on the program operation, approving policy and procedural exceptions, resolving disputes, investigating problems and directing corrective action, and freezing vacancies to ensure placement opportunities for eligible program registrants;

C1.4.1.2. Five Component Coordinators. They are responsible for ensuring the proper operation of the PPP and associated programs within their respective DoD Component; and

C1.4.1.3. Regional Coordinators. They are responsible for assisting the CARE Program and Component Coordinators in the proper operation of the PPP within specific geographical regions.

C1.4.2. All Coordinators. They are responsible for interpreting and administering policy and ensuring consistent and efficient program operations.

## C2. CHAPTER 2

### PPP ASSISTANCE VISITS

#### C2.1. TYPES OF PPP ASSISTANCE VISITS

C2. 1.1. There are three types of PPP reviews:

C2. 1.1.1. Activity Program Reviews;

C2. 1.1.2. Problem-Oriented Reviews – general or specific inquiries; and

C2. 1.1.3. Complaint-Oriented Reviews.

C2. 1.2. The basic procedures for conducting any of the three types of reviews are essentially the same; only the scope and the reporting format vary.

C2. 1.3. Activity program reviews are usually conducted at the HR Regional Service Centers (RSC), since the RSC is generally responsible for PPP registrations, requisitions, qualification determinations, etc. When these responsibilities reside at locations other than the RSC, the site of activity program reviews will be determined accordingly. These locations could include the Customer Support Unit (CSU), the career program management office, or the Delegated Examining Unit (DEU) office. Problem-oriented reviews and complaint-oriented reviews may be conducted at the RSC, the CSU, or both, depending on the nature of the problem or complaint.

C2. 1.4. Assistance visits include a review and assessment of standard operating procedures (SOP) and quality control measures and, as a minimum, consist of reviewing:

C2. 1.4.1. Program records, regulatory material, and documentation;

C2. 1.4.2. Audit trails;

C2. 1.4.3. Program support documents from the Commander, the Human Resources Office (HRO), and installation managers; and

C2. 1.4.4. Internal SOPs prescribing activity procedures to ensure PPP policy compliance.

C2. 1.5. The visit will also include an assessment of program status. Knowledge of program status is a prerequisite for full support.

C2. 1.5.1. A review of Registering Activity operations normally consists of analyzing active and inactive registrant files under the various programs (the Priority Placement Program (Program A), the Retained Grade Program (Program R), the DoD Military Spouse Preference Program (Program S), and other programs described in the PPP Operations Manual) to determine if program actions were timely and proper.

C2. 1.5.2. A review of Gaining Activity operations may include:

C2. 1.5.2.1. Matching vacancies against Program registrants that were available during the time the action was in process by pay group, skills, option codes, grades, and priorities;

C2. 1.5.2.2. Matching permanent positions occupied by reemployed annuitants;  
and

C2. 1.5.2.3. Assuring requisitions and report actions were submitted in a timely manner, qualifications were determined properly, and job offers were made promptly.

C2. 1.5.3. A review of the activity's internal controls will include an analysis of the quality control or audit process. A spot check of conformity may involve any one or more of these processes.

C2. 1.6. Checklists for the reviews referenced above are provided in Appendix 1.

## C2.2. PRE-REVIEW CHECK

The evaluator should examine all supplementary or explanatory documents relating to the PPP including special internal procedures, and if available, those applicable to the Automated Stopper and Referral System (ASARS). If systemic problems or violations have been discussed in prior correspondence, particularly because of previous reviews, those areas should be carefully checked. The evaluator should also determine if the HR specialists who work with the Program have the knowledge/training to support proper system operations, and if they are being kept informed of program changes and updates.

## C2.3. PRIMARY AREAS OF ASSESSMENT

C2.3.1. Conducting proper assessments requires an understanding of certain major operating elements of the Program. These elements are:

C2. 3.1.1. Program eligibility requirements;

C2.3.1.2. Program registration parameters (including, but not limited to, priority, skills, option codes, and area of referral);

C2.3. 1.3. Guidelines for submitting requisitions;

C2. 3.1.4. Knowledge of qualifications determinations;

C2.3. 1.5. Procedures for making offers;

C2.3.1.6. Report actions; and

C2.3.1.7. Audit trails.

C2.3.2. These elements are discussed briefly below:

C2.3.2.1. Program Eligibility. The PPP consists of a number of related, but separate, placement assistance programs. Although each of these programs has different registration eligibility criteria, there are two standard requirements:

C2.3.2. 1.1. All registrants must be well qualified for the skills for which registered; and

C2.3.2.1.2. Registrants' performance or conduct may not be in question.

(Note: The unique registration eligibility criteria for the various programs can be found in the PPP Operations Manual.)

C2.3.2.2. Priority. The PPP Operations Manual, Chapters 3 and 4, describes the numeric referral priorities to which registrants are entitled and the effect these priorities have on filling vacancies at activities to which registrants are referred. Unless an authorized exception is invoked, Priorities 1 and 2 prohibit all appointments, promotions, demotions to positions with greater promotion potential, transfers, reassignments, reinstatements, and conversion actions. Generally, Priority 3 prohibits appointments, reinstatements, and transfers of employees from outside the Component. (For this purpose, there are five Components: Army, Navy, Air Force, the Defense Logistics Agency, and the Defense Agencies.)

C2 .3.2.3. Skills. Generally, employees must register for their current skill. Any exception to this rule requires CARE Program Coordinator approval. Employees may register for a total of up to five skills provided they are well qualified for typical positions in each selected skill. To be considered well qualified, registrants must be able to successfully perform the duties of the new position, with orientation only. Generally, recency of experience is an important factor in the selection of skills and determination of qualifications. Minimum qualification standards may not be used for qualifications

determinations in the PPP, and qualifications may never be waived in the registration process.

C2.3.2.4. Option Codes. PPP Operations Manual, Chapter 10, lists the option codes that are authorized for use in registering skills or in identifying position requisition requirements. Option codes identify special skill requirements for positions for which well-qualified registrants are permitted to register. Before submitting an ASARS requisition, activities must determine if one or more option codes are applicable to the position vacancy. The option codes are then used with the pay group, series, and grade of the position for requisition purposes.

C2.3.2.5. Area of Referral. Displaced employees will normally be registered and referred for placement consideration at the minimum number of DoD activities likely to provide a placement opportunity within the zone. All activities must be acceptable to the registrant, except in the case of a mandatory registrant. Mandatory registrants must be registered for all activities in the commuting area using the registrant's skill(s). Registration beyond the employee's commuting area is voluntary. Registrants may not skip intervening activities or states, and register for activities or states that are more distant. In determining the most appropriate area of referral, good judgment must be applied in identifying activities likely to provide the maximum opportunities for job placement.

C2.3.2.6. Automated Stopper and Referral System (ASARS) Requisitions. Requisitions must be submitted for positions in the competitive and excepted service, including permanent, temporary, term, part-time, intermittent, and seasonal; at grades GS-01 through GS-15; for all Federal Wage System (FWS) grades; and for all special pay systems. All vacant positions not otherwise covered by an authorized exception in the PPP Operations Manual must be matched through ASARS during the recruiting cycle, until a referral list is issued. Permanent positions occupied by reemployed annuitants are subject to continual clearance, and the annuitants are subject to displacement by Priority 1 and Priority 2 PPP registrants who are being involuntarily separated through no fault of their own. Positions filled on a temporary, term, part-time, intermittent, or seasonal basis must be cleared for registrants in the commuting area unless an exception authorized by the PPP Operations Manual applies. Any delays in submitting requisitions, that cannot be explained or that are not depicted clearly in the audit trail documents, are an indication of possible violations. Delays that appear avoidable, but not reasonably explainable, become prima facie evidence of needed corrections in the operation of the system at that activity.

C2.3.2.7. Qualifications Determination. Potential Gaining Activities are not authorized to unilaterally disqualify registrants. Procedures to address qualifications disputes are outlined in the PPP Operations Manual, Chapter 4.

### C2.3.2.8. Making Offers

C2.3.2.8. 1. Upon receipt of resumes, offers are made in priority order, i.e., Priority 1 before Priority 2, etc. Within a priority, offers are generally made to any registrant unless the PPP Operations Manual dictates otherwise (e.g. certain Priority 2 registrants are considered after all other Priority 2 registrants), or the Component has issued policy on the order of offers.

C2.3.2.8.2. Once it is determined to whom an offer will be made, it must be communicated to the registering Human Resources Office (HRO). A careful review should be made of any delays in making offers. It is not proper to communicate with the Registering HRO to determine a registrant's availability for the position. The fact they are registered and referred to a given activity indicates availability. When there is a question about qualifications, the proper approach is for the potential Gaining HRO to indicate it has received the individual's resume, and is prepared to make an offer, if the joint qualifications determination confirms that the registrant is well qualified.

C2.3.2.8.3. After an offer is made, registrants in the United States have 2 calendar days to accept or decline. Overseas registrants have 3 calendar days. Registrants are eligible for only one valid offer (with the exception of Priority 3, military spouse program registrants, as outlined in Program S of the PPP Operations Manual). The registrant's response must be reported immediately to the Gaining Activity.

C2.3.2.9. Report Actions. Both Registering and Gaining Activities are required to submit appropriate ASARS report actions on all registrations and requisitions. Gaining Activities must submit a report action promptly on determining that consideration of the referred registrant is no longer required under program policies. Registering Activities must also submit report actions promptly to delete registrants who are no longer eligible for placement consideration. The PPP Operations Manual, Chapter 9, contains the instructions for proper completion and submission of these report actions.

### C2.3.2.10. Audit Trails.

C2.3.2. 10.1. Activities must maintain clear audit trails on all actions. However, there is no prescribed format or method for maintaining these audit trails or for internal controls. As a minimum, registering activity audit trails must include copies of all registration documents (e.g., registration form and counseling checklist, application and/or resume, file maintenance actions, etc.), and documentation of all qualification determinations, job offers, and registrant responses. Gaining Activity audit trails must include a file of all requisitions by locally assigned control numbers, referral resumes, and documentation to show that all positions were cleared or were exceptions from program coverage. Additionally, the activity must be able to match each requisition to

the specific request for personnel action (RPA), or recruitment action, and the audit trail must clearly support the action taken.

C2.3.2.10.2. Evaluators are cautioned not to use conjecture but to follow the audit trail of questionable actions and practices to factually support any findings. For example, filling a vacancy by merit promotion while a Priority 1 or 2 registrant is available gives rise to questions, but may or may not be a violation.

C2.3.2. 11. Quality Control and Program Assessment. An internal quality control and program assessment process should be in place. This may be part of the activity's standard HR self-audit/review process, or it may be a separate, independent review of the PPP. The quality control process should include a sampling of actions on a periodic basis by an individual or a team to verify full compliance with program requirements. A written report of the results of the review should be provided to the HR Officer.

### C3. CHAPTER 3

#### REVIEW METHODOLOGY

##### C3.1. HOW TO SURVEY

Reviews consist of the following five phases: Collecting information or fact-finding; analyzing and interpreting the data; reporting the results of the analysis; specifying necessary corrective actions; and following up to ensure specified actions were taken and program deficiencies were remedied.

##### C3.2. SAMPLE SELECTION

The evaluator should remain flexible when selecting the size of the sample rather than committing to a prescribed number or type of personnel actions. Initially, the review should concentrate on the more fundamental program requirements, such as clearing all Priority 1 and 2 registrants before effecting competitive promotions, and clearing all three priorities before filling positions with candidates from other Components. Violations are also frequently related to improper selection of option codes, withholding or canceling Requests for Personnel Actions (RPAs), or changing or altering the position when a PPP registrant has been referred, etc. The evaluator must have an open and objective attitude to allow initial findings to determine the size of the sample. In some activities, a review of one month of actions may be sufficient, while another activity may require a review of a 12-month period or longer before a complete review may be accomplished. An experienced evaluator can routinely make this determination based on preliminary results.

##### C3.3. TRAINEE AND POSITION REENGINEERING ACTIONS

Evaluators should look very carefully at positions being filled at a grade below the full-performance level with promotion potential. Requisitions for positions covered by formal training programs must be submitted at the entry grade using the trainee (TRA) option code. If recruitment is at multiple entry grades, separate requisitions must be submitted for each grade. When formal trainee positions are filled, only qualified PPP registrants at the entry grade(s) with the trainee option (TRA) will be matched against the vacancy. Requisitions for developmental or restructured positions being filled at grades below the full-performance level will be submitted at the target grade. These positions do not meet the criteria for clearing at the entry grade with the TRA option code. Evaluators should review several of these action types (e.g., formal training positions, developmental, or restructured positions) to ensure proper procedures were followed.

### C3.4. QUESTIONABLE ACTIONS

C3 .4.1. Evaluators should be especially alert for actions such as reclassifying or otherwise changing positions (e.g., upgrading, downgrading, adding or deleting option codes, or changing positions from temporary to permanent and back again) when PPP registrants are available. In all such cases, the activity must be able to justify the action taken and have documentation that CARE Program Coordinator approval was granted.

C3.4.2. The evaluator should determine whether the Coordinator structure has questioned actions or practices of the activity in the past, and review the results of any inquiries regarding questionable report actions.

### C3.5. INTERNAL PRACTICE REVIEW

C3 .5.1. Evaluators should identify internal operating procedures or practices that are inconsistent with the spirit and intent of the Program. They may include:

C3 .5.1.1. Delays in Requisitioning or Making Offers. The word “prompt” is used throughout the PPP Operations Manual. It means to take action at the first opportunity. As soon as an RPA is received in the staffing function, or once recruitment has begun in anticipation of the receipt of an RPA, a requisition must be submitted, unless an exception applies. As soon as resumes are received, the process for making qualification determinations and extending offers must begin immediately. In reviewing these processes, evaluators should check for any delays in requisitioning and making offers. In this regard, the key factors to review are documented dates (e.g., the dates RPAs are received in the staffing area, the dates of requisitions, etc.). Evidence of recurring delays may indicate that stricter controls are required or that violations have occurred.

C3.5. 1.2. Overdue Resume Report Actions. Activities must submit report actions promptly after resumes have been worked. Multiple instances of delinquent report actions could indicate efforts to avoid making offers or carelessness in administration, either of which indicates a need for stricter management controls.

C3 .5.1.3. Qualification Disputes. Qualifications are jointly determined by the gaining and registering activities. Program administrators should submit disagreements on registrant qualifications immediately to the respective Regional Coordinator. Procedures for resolving qualifications disputes are outlined in the PPP Operations Manual, Chapter 4. Evaluators should review the activity’s history of qualifications disputes. Further, a high incidence of “registrant not qualified per releasing CPO” may be perfectly valid, but Office of Personnel Management (OPM) qualification standards and the related job descriptions should be reviewed. A high incidence of formal qualifications disputes, generated by the potential Gaining Activity but which are resolved in favor of the Registering Activity, may be an indicator of efforts designed to avoid placements.

C3 .5.1.4. Unilateral Withdrawal of Offer Prohibition. Unilateral withdrawal of offers is expressly prohibited by program policy and is cause for a program review. Only a CARE Program Coordinator can authorize withdrawal of an offer.

C3 .5.1.5. Required Records. PPP policy requires activities to establish and maintain PPP records for 2 years. Registration records must be retained for 2 years after the date of the registrant's release from the Program. Requisition records must be retained for 2 years after the closing date of the requisition. Normally, the records will be maintained in sequential, chronological order with active and inactive files kept separately.

C3 .5.1.6. PPP Training. It is essential that HR specialists working with the Program understand all policies and procedures applicable to the PPP. The HRO should train a sufficient number of people, depending on the size of the activity and number of staffing specialists or teams to effectively administer the Program. Up-to-date knowledge of the Program is important, particularly if the activity is facing a reduction-in-force (RIF) or base closure. Also, frequent program changes make periodic refresher training critical for those individuals who use the Program regularly. The review should identify any training needs, including the names of the individuals needing initial or refresher training.

## C4. CHAPTER 4

### GAINING ACTIVITY PROCESS

C4.1. MATCHING PERSONNEL ACTIONS. The purpose of the review is to determine whether personnel actions have been properly cleared through the ASARS requisitioning process. This requires familiarity with the HRO's SOPs for matching and documenting clearance of personnel actions.

C4.2. THE PROCESS. The evaluator may randomly select personnel actions based on a Defense Civilian Personnel Data System (DCPDS) listing of the actions to be reviewed during the assessment period (e.g., appointments, promotions, reassignments, etc.). Once the random sample is selected, the Official Personnel Folders (OPF) and other related documents will be reviewed. For example, in reviewing a position that was filled under competitive promotion procedures, the evaluator will compare the date the staffing function received the RPA, or the date recruitment was actually initiated, with the date a requisition was submitted. If a requisition was not submitted, the evaluator must determine whether an exception was annotated on the RPA or recruitment file and whether the exception is appropriate. Furthermore, the evaluator must determine if the requisition remained active in ASARS for the required length of time. Standard exceptions, which activities may invoke without Coordinator approval, are listed in the PPP Operations Manual, Chapter 4. Any other exceptions must be approved by the appropriate official within the Program Coordinator structure. If no exception was invoked and there is no record of a requisition, a program violation is likely. Each selected action is reviewed in this manner.

C4.3. THINGS TO WATCH. In reviewing requisitions, the evaluator should pay particular attention to the following:

C4.3. 1. Option Codes. When used, these three-character codes must be clearly identifiable and corroborated by the audit trail. Consistency among the option codes on a position and similar positions should be checked along with the reasonableness of the option(s) selected.

C4.3.2. Program Referral Priority. In determining a match for a given action, the evaluator should keep in mind the three priorities and the effect these priorities have on filling vacancies. Any action that falls under the purview of the PPP must be cleared against Priority 1 and 2 referrals. The applicability of Priority 3 referrals is predicated on the staffing method used and whether military spouses were referred. If an activity fills a vacancy from internal sources (i.e., Component candidates only) using competitive procedures, it must submit a requisition for matching Priority 1 and 2 registrants, and Priority 3 military spouses. Positions filled internally using noncompetitive procedures

are subject to Priority 1 and 2 referrals only. Recruit actions where only non-Component candidates are being considered, must be cleared against Priority 1, 2, and 3 registrants. The process, however, becomes more complex when both Component and non-Component candidates are being considered. In this instance, a requisition, when required, should be submitted for all registrants (Priorities 1, 2, and 3). Priority 1 and 2 registrants must always be cleared. Priority 3 registrants must be cleared only when a non-Component candidate is being selected.

C4.3.3. Identical Vacancies. When multiple, identical vacancies are cleared on the same requisition, the activity may issue a referral list, close the requisition, and make selections to fill any vacancies over and above the number that would be required to accommodate matching PPP registrants. For example, if a requisition is submitted for ten identical vacancies and ASARS refers four matching registrants, the activity may continue the recruitment or staffing process on six of the vacancies and hold the other four in abeyance to accommodate the potential placement of the four registrants.

C4.4. COMPLIANCE AND PROGRAM SUPPORT ASSESSMENT. A mandatory placement program may generate resistance on the part of managers and supervisors, but this must not be allowed to adversely affect proper program management. An evaluator should identify any serious lack of affirmative support for the Program and take corrective action. Affirmative support of the Program can be measured by the degree of compliance, the issuance of the Commander's statement of support, training course attendance, number of requisitions, etc. The number of offers made may also be a meaningful indicator. In any event, the evaluator should assess efforts made to support the Program based upon the positive results gained or achieved in placing PPP registrants, or the potential for such achievements.

C4.5. INTERROGATION. The review should also include an assessment of the use of PPP interrogation procedures, even though it is an optional program feature. The evaluator should determine if those who are responsible for the operation of the Program are aware of the benefits of the interrogation process and spot check positions filled during a given period against potential candidates. While the interrogation process does not require exact matches, activities may use the process for hard-to-fill jobs. Credit should be given for using the interrogation process as a recruitment aid.

## C5. CHAPTER 5

### REGISTERING ACTIVITY PROCESS

C5. 1. GENERAL. A review of the Registering Activity focuses primarily on whether the activity properly registered eligible individuals and effectively managed registrations to maximize placement opportunities. In order to conduct the review, registration files of all program registrants must be made available.

C5.2. PROGRAM ELIGIBILITY. Each of the various PPP placement programs have different registration eligibility criteria. When reviewing the registration files, the evaluator should ensure each registrant meets the specific eligibility criteria of the program for which registered. In this regard, the evaluator should determine whether there were any actions within the past 2 years that would have generated registration eligibility (e.g., RIF, TOF, etc.), and obtain the names of the affected employees.

C5.3. QUALIFICATIONS. Individuals are eligible to be registered only for skills for which they are determined well qualified. This means they should be able to satisfactorily perform duties of typical positions in the skill for which registered with orientation only. This level of qualifications exceeds minimum OPM qualifications standards. The evaluator should closely review skills for which individuals are registered to ensure they meet all the qualifications and legal requirements, including any physical requirements and performance factors (e.g., performance tests, if required). In the PPP registration process, there is no substitution of education for experience. Employees are not eligible to register for any skill unless they have actually performed the types of duties typically required in that skill.

C5.4. PERFORMANCE AND CONDUCT. An employee whose job performance or conduct is in question is not eligible to register. If already registered, he or she must be removed from the Program. The PPP Operations Manual, Chapter 3, provides guidance on determining when an individual's performance or conduct is in question. Evaluators should review whether the individuals responsible for program registrations are familiar with the performance and conduct guidance. The evaluator should determine the type of system the registering activity has in place to ensure that the performance and conduct factors are properly considered, not only prior to registration, but also throughout the registration period. Such a system may include:

C5.4. 1. Routing PPP registrations through the Employee Relations function for review to ensure there is no unfavorable conduct or performance information that would preclude registration.

C5.4.2. Placing a notice on top of the left hand side of the OPF, including posting in the electronic OPF, to identify the employee as a PPP registrant and stating that any

change in the employee's current employment status or the receipt of unfavorable information concerning the employee's performance or conduct, must be brought to the attention of the staff member with oversight responsibility for PPP registrations.

C5.4.3. The absence of a system or procedures to handle such matters should alert the evaluator to the possibility of potential problems.

C5.5. OTHER REGISTRATION DATA. Registrations should also be reviewed for the following:

C5.5. 1. Registrant was assigned proper priority designation;

C5.5.2. Area of referral was established in a logical fashion;

C5.5.3. All elements on the registration form were properly completed;

C5.5.4. Option codes were appropriately used;

C5.5.5. If applicable, the three broad skill identification codes – GS-300, WG-00000 and WG-01 111 -- were used to the registrant's best advantage;

C5.5.6. Registrations were periodically reviewed for possible file maintenance changes needed to enhance placement opportunities;

C5.5.7. Mandatory registrations complied with specific program provisions (e.g., mandatory registration for all activities in the commuting area);

C5.5.8. Current supervisors were registered, as available, for supervisory positions;

C5.5.9. Written approval by the appropriate CARE, Component, or Regional Coordinator was documented when area of referral is beyond that which would normally be allowed; and

C5.5.10. Errors in the registration process resulted in questionable placements at other activities, placements of unqualified or ineligible registrants, or registrants to miss consideration for placement.

C5.6. TIMELINESS. The evaluator should track the time period from when an individual becomes eligible for registration to the time the registration is completed and submitted. As a minimum, the review should provide the following information:

C5.6.1. The length of time between the date of completion of a registration and the date registration data was submitted to ASARS.

C5.6.2. The length of time it took the Registering Activity to relay a job offer to the registrant, and the length of time it took to communicate the results of the offer to the potential Gaining Activity.

C5.6.3. The length of time it took the Registering Activity to submit a Report Action to delete a registrant, once that registrant's program eligibility terminated, i.e., the date program eligibility terminated to the date of submission of the report action.

C5.6.4. The prompt submission of mandatory registrations. (NOTE: Mandatory Program A registrants should be registered immediately upon receipt of a specific separation notice. Program R registrants should be registered when the grade retention period begins.)

C5.7. RETAINED GRADE PROGRAM (PROGRAM R). Employees, who are entitled to grade retention after RIF demotion or reclassification to a lower grade, including those transferred or reassigned into an activity, must be registered in Program R unless they are eligible for Program A registration, or have filed a formal appeal of the downgrade action. The registration eligibility criteria and special rules concerning area of referral, grades, and skills are covered in the PPP Operations Manual, Chapter 15. Evaluators should review the quality of registrations. Program R registrations have several key factors which should be reviewed:

C5.7. 1. The period of registration must coincide with the grade retention period;

C5.7.2. The registration is allowed at the retained grade only and does not include intervening grades;

C5.7.3. The registration must include all skills, up to five, for which the registrant is well qualified at the retained grade level;

C5.7.4. The registration in other pay groups, i.e., other than the pay group of the retained grade position, is not permitted;

C5.7.5. The area of referral is restricted to the registrant's commuting area unless the Component or CARE Program Coordinator has granted an exception; and

C5.7.6. The offers made to registrants must be in writing and inform registrants that entitlement to grade retention will terminate upon declination of a reasonable offer.

## C6. CHAPTER 6

### PROGRAM REVIEW FINDINGS AND CORRECTIVE ACTIONS

#### C6.1. GENERAL

C6. 1.1. Program errors can have varying degrees of effect on program operations and registrant placement opportunities. Examples of severe program errors include:

C6. 1.1.2. Denial of mandatory placement rights by failure to properly clear personnel actions;

C6. 1.1.3. Failure to afford employees their registration entitlements;

C6. 1.1.4. Untimely or delinquent registrations; and

C6. 1.1.5. Faulty qualification determinations resulting in the placement of registrants unable to perform their duties, or the denial of offers to well-qualified registrants.

These errors have a significant adverse effect on registrants and the Department of Defense. Other errors may also create problems without directly affecting registrants (e.g., cases where ASARS clearance or authorized exceptions are not documented, incomplete audit trails, untimely report actions, or failure to maintain proper program files).

C6. 1.2. Program errors can be grouped into three broad categories:

C6. 1.2.1. Program Violation. A program violation is an action or inaction that results from the improper application of an established policy or procedure, and/or denies or reduces the regulatory rights of a registrant, or results in placement of unqualified or ineligible registrants;

C6. 1.2.2. Procedural Errors. A procedural error results from an action or inaction that does not comply with regulatory or procedural guidance, but does not violate the mandatory placement rights of an individual, or affect placement at another activity; and

C6.1.2.3. Systemic Problems. A systemic problem occurs when policy or procedural errors are commonly repeated in the administration of the Program, i.e., are not isolated. Regardless of the nature of the error, immediate corrective action is required.

C6.1.3. Identifying program errors is not the primary objective of the review process. Problem areas must be analyzed as to the effect on individual registrants, the likelihood of repetition, and the numbers and kinds of alternative solutions. After the cause of the error is identified, it must be corrected to improve program performance and, where appropriate, reestablish the registrant's rights.

## C6.2. CORRECTIVE ACTIONS

C6.2. 1. Depending on the nature and extent of errors, various types of corrective actions may be required. It may be as simple as ensuring that an action does not recur or as complex as making a retroactive job offer to a registrant who missed a placement opportunity. However, in every instance, the evaluator must emphasize that the primary goal of review is assistance. Activities must be forthright in admitting errors. Efforts to conceal errors are counter-productive and are viewed as compounding the mistake. In those instances where activity officials knowingly commit errors, and/or where multiple errors are discovered, administrative and/or disciplinary action may result.

C6.2.2. In the review process, the two types of corrective actions normally include directed actions and recommended actions. These might include directing that the activity make a job offer to a registrant denied his/her mandatory placement rights, or directing that certain local procedures be established to ensure that systemic problems are corrected. Recommended corrective actions are not mandated, but are intended to improve local practices so the errors are not repeated. The evaluator should determine the nature and extent of corrective actions based on all the facts gathered during the review.

C6.2.3. The review process is primarily concerned with the identification and correction of problem areas. The process would serve little purpose without establishing the cause of problems and specifying the appropriate corrective action. However, highlighting successful operations and best practices is also beneficial so that the procedures and methods can be shared with other activities.

C6.2.4. The CARE, Component, or Regional Coordinators will direct corrective actions, within their respective areas of authority.

## C6. 3. RECONSTRUCTION

C6.3.1. In cases where PPP registrants may have been denied proper consideration for placement due to program errors, deficiencies, or violations, every effort must be made to restore the missed opportunities. This involves reviewing the ASARS history file to reconstruct the circumstances that would have been in effect during the time in question, if the error, deficiency, or violation had not occurred. In other words, the purpose of reconstruction is to restore mandatory placement rights that may have been

negated by the error. After reconstructing the circumstances, the evaluator must determine whether the activity has an obligation to a registrant, as well as the nature of that obligation.

C6.3.2. Activities frequently discover errors or potential violations through self-review. In this case, they may contact the Priority Placement Support Branch (PPSB) and request a reconstruction for the relevant timeframe. When the reconstruction report is forwarded to the activity, a copy is provided to the appropriate CARE Program Coordinator. A determination of the necessary, corrective action is based on the nature of the error and the availability of the registrant.

C6.3.3. After an on-site review, the review team or the activity may need to initiate reconstruction of matching and referral actions based on identified program errors. The reconstruction information is included in the review report as well as any corrective action required. Evaluation teams are responsible for follow-up to insure that corrective actions have been taken.

C6.3.4. Reconstructions are often required because of procedural errors or ASARS system problems. When the reconstruction is driven by a procedural error or system problem, and when the error is clearly not the fault of the activity, retroactive corrective action may not be required. Although the format of such reconstruction actions are similar to those resulting from self or on-site reviews, the treatment can be markedly different based on the nature of the procedural problem.

## CHAPTER 7

### EVALUATION REPORTS AND FOLLOW-UP

#### C7.1. REPORTING

The format of a DoD PPP assessment report should generally follow the outline of the review process. It should parallel as closely as possible the out-briefing provided at the conclusion of the assessment. In addition to the problems identified, it should identify successful procedures and methods used by the activity, since both successes and deficiencies are often forwarded to other DoD activities. Errors should be detailed in the report, including the directed or recommended corrective actions. The original review report is sent to the Installation Commander or Activity Head. Copies are provided to the Director, Civilian Personnel Management Service, the Component Coordinator, and the Component Regional Coordinator.

#### C7.2. PROGRAM REVIEW RATINGS

The determination of a program review rating is accomplished by reference to a set of primary program areas and the elements of program management or administration that comprise each area. These areas are defined in Chapter 2 of this guide and are included in the checklists found in Appendix 1. Each area is reviewed and should be given a pass or fail rating.

#### C7.3. FOLLOW-UP

Normally, preliminary findings are provided to the activity at the close out. The activity has 45 days to respond to the findings. If the activity response provides the necessary justification or appropriate corrective action, the finding will not be included in the final report. If the activity response is not appropriate, a corrective action is required. In some situations, it may be necessary to schedule an on-site follow-up. Each response to a review finding must be further evaluated to ascertain whether the problem is resolved, or the proper corrective action has been taken. Once the evaluator is satisfied that all corrective action has been taken, the review is closed-out in writing. In those instances where the activity has no program errors, the review is usually closed out when the report is published. In these cases, no follow-up is required.

## CHAPTER 8

### STAFF ASSISTANCE

The DoD CARE Office staff provides support to DoD activities in a number of ways, including staff assistance visits; workforce, union, and management briefings; and assistance in assembling registration teams. Staff assistance visits are usually informal reviews that precede an activity closure or a major drawdown and are normally requested by the activity. Procedures, methods, and actions are reviewed at the activity level and advisory information is provided. No written report is provided. This support is often crucial to program management at the installation level, to establish an environment of understanding and cooperation. As needed, the CARE Program Coordinator will assist activities in assembling registration assistance teams. These teams of HR specialists will visit activities facing major reductions or closure, conduct orientation and registration briefings, counsel affected employees, and register employees in the PPP on behalf of the activity.

**APPENDIX 1**

**EVALUATION CHECKLIST**

**PROGRAM AREA – Program Support**

Program Element	In Compliance	
	Yes	No
Current Commander’s Support Statement is published and distributed to the workforce. (Commander organizationally responsible for the HRO is required to issue a support statement, as a minimum.)		
Commander is briefed on program responsibilities, as well as the value and advantages of the Program.		
Supervisors and managers are briefed on program responsibilities, as well as the value and advantages of the Program.		
Program information is disseminated to all activity employees (e.g., benefits, results, policy changes).		
Activity periodically performs program self-review.		
When appropriate, activity took timely, corrective action on its own initiative.		

**PROGRAM AREA – Regulatory Material and Program Records**

Program Element	In Compliance	
	Yes	No
CARE messages are circulated among staff members without an ASARS account, as appropriate.		
All staff members involved in PPP administration have ready access to DoD Directive 1400.20, CPM Subchapter 1800, PPP Operations Manual, and DoD Activity Description Guide.		
Program records (Registering Activity and Gaining Activity) are properly maintained and current for a 2-year period.		
Audit trails of program actions are complete.		

**PROGRAM AREA – Training**

Program Element	In Compliance	
	Yes	No
Individuals responsible for PPP program management are formally trained on the DoD PPP within the past 3 years, or have completed available PPP distance learning courses.		
Recently assigned PPP program managers received On-the-Job-Training (OJT) when formal training was not available.		
Program managers possess the necessary knowledge for successful program management at the activity level, i.e., conversant in policies and procedures, able to relate specific policies to case situations, and capable of locating specific information in regulatory materials.		
Activity HR managers are aware of the function of the Coordinator structure.		
Activity supervisors are aware of PPP placement requirements.		
PPP regulatory and procedural processes are part of the first line supervisory training.		

**PROGRAM AREA – Gaining Activity**

Program Element	In Compliance	
	Yes	No
Permanent positions encumbered by reemployed annuitants are continually cleared, as appropriate.		
Matches between vacancies and registrants are appropriately determined (e.g., priority, pay plan, series, grade, skills (including option codes), area of referral, program code, nature of the position, etc.).		
Program management officials are aware of the requirements to match temporary, term, part-time, intermittent, or seasonal positions.		
Requisitions are submitted on a timely basis.		
Procedures are established to ensure that option codes are clearly identified, when used in the matching process.		
Resumes are worked in a timely manner and offers are made promptly.		
Offer notifications included information affecting the validity of the offer (e.g., located at remote site, status of the activity, mobility requirements, etc.).		
Highest grade is worked first on a registrant referred to an activity on the same date for various grade levels.		
Job offers are made in proper priority order.		
Resume report actions on each program action are routinely accomplished within processing time limits.		
Program exceptions, invoked by the HRO, are clearly documented and fully substantiated.		
Special exception requests, requiring CARE Program Coordinator approval, are properly submitted and documented.		
Activity has complied with restrictions on special exceptions.		

**PROGRAM AREA – Gaining Activity (continued)**

Program Element	In Compliance	
	Yes	No
Covered personnel actions were processed only when ASARS was clear of registrants who would preclude such actions, or when an appropriate exception was applied.		
Specialists working with the Program are familiar with procedures for resolving disputes (e.g., qualification, conduct, performance, suitability, security, etc.).		
Specialists working with the Program are familiar with policies and procedures for requesting an employment application or employee resume.		
Exception and dispute procedures are used judiciously.		
Positions are not revised or canceled in order to avoid PPP placements.		
Positions are not changed to temporary and later returned to permanent in order to avoid PPP placements.		
RPA's are not returned to activity officials while matches exist in order to avoid PPP placements.		
Positions are not reengineered up or down, for the purpose of avoiding program responsibilities.		
Activity maintained program files for 2-year period (requisitions, resumes, unmatched vacancy requisitions, position offer correspondence).		
Activity has positions at remote locations (activity codes B, C, D, etc.), and is aware of the program responsibilities in supporting remote sites.		
Activity has positions at remote, non-coded activities and is aware of the program responsibilities involved.		

**PROGRAM AREA – Gaining Activity (continued)**

Program Element	In Compliance	
	Yes	No
Activity has waived qualifications in order to make an offer to a program registrant. (Note: Since qualification waivers are not required, this may be indicative of efforts to maximize placement opportunities for PPP registrants.)		
Interrogation procedures have been used for self-review and recruitment purposes. (Note: Interrogation is a voluntary procedure.)		
Activity is giving priority consideration to internal employees receiving retained grade and retained pay as repromotion eligibles (exception to Priority 1, 2, 3 registrants). (Note: This is not a violation.)		

**PROGRAM AREA – Registering Activity**

Program Element	In Compliance	
	Yes	No
Employees with registration eligibility for each Program (e.g., Program A, Program R, Program S) are properly and promptly registered.		
Program eligibility was determined correctly in regard to performance and conduct.		
Employees were counseled concerning registration eligibility and resulting responsibilities.		
The registrant and the HRO representative have signed the registration form and counseling checklist, unless there are unusual circumstances that are properly documented.		
Priorities were assigned in accordance with DoD policy.		
Registrant's skills and qualifications are properly rated (registrant must be well qualified).		
Skills for which registered were consistent with registrant's qualifications and program parameters.		
Area of referral is appropriately determined and conforms with the spirit and intent of DoD policy.		
When necessary, requests for expanded areas beyond current policy have been forwarded to the CARE Program Coordinator on a timely basis.		
Registrants are physically qualified for positions for which registered.		
Registrants, who became temporarily unavailable for work after registration, were removed from the Program and reinstated only when they could report for duty within the standard reporting time.		

**PROGRAM AREA – Registering Activity (continued)**

Program Element	In Compliance	
	Yes	No
File maintenance is accomplished, when determined necessary, and submitted on a timely basis.		
Each registration was reviewed based on a time-phase plan (30-60 days), and when necessary, registrants were subsequently counseled concerning action needed to increase placement potential.		
Officials with registration responsibility are aware of, and are properly implementing the policies and procedures concerning mandatory registrants (e.g., severance pay recipients, retained grade recipients, etc.).		
Replies to position offers are promptly provided to Gaining Activities (2 calendar days for CONUS registrants, 3 calendar days for OCONUS).		
Placements are immediately reported through ASARS to avoid unnecessary referrals.		
Declinations of valid offers are immediately reported through ASARS so the registrant is promptly removed from further Program consideration.		
Registrants, who are not available for placement for reasons other than placement and declination, are promptly removed from the Program to avoid unnecessary referrals.		
Employees, placed through Program referral, are promptly released (normally 2 weeks with a maximum of 30 days CONUS and a maximum of 45 days from overseas).		

**PROGRAM AREA – Retained Grade**

Program Element	In Compliance	
	Yes	No
Information, concerning offers and responses to Gaining Activities, is included in the registration file.		
Releasing HRO has provided adequate information to registrants and routinely publicizes the Program to employees, supervisors, and managers.		
Program managers are aware of the policies and procedures of Program R.		
Area of referral is properly established and expanded in accordance with policy.		
All retained grade recipients are registered promptly at the beginning of the grade retention period.		
Registration is only for the grade and pay plan of the retained grade.		
Registration includes the maximum number of skills for which the registrant is well qualified.		
Program R registrants are receiving priority consideration for re-promotion in accordance with local merit promotion plans.		
Offers are made in writing and include a copy of the position description, as well as information detailing that benefits will be terminated if the offer is declined, and that the action may be appealed through the Office of Personnel Management.		
Report actions are promptly reported through ASARS.		
Reconstruction actions are processed for late registrations.		