



NATIONAL ASSOCIATION OF POSTAL SUPERVISORS

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February 25, 2022

Mr. Bruce Nicholson
Manager, Labor Relations Policy Administration
United States Postal Service
475 L'Enfant Plaza SW Room 9024
Washington DC 20260-4000

Re: USPS FY 2022 NPA Thresholds, Goals, Scorecards and PFP 10-Cell Matrix

Dear Bruce,

The National Association of Postal Supervisors (NAPS) remains committed to working in partnership with the Postal Service on our established USPS/NAPS Work Study Group. It is unfortunate that NAPS, after making eight failed attempts to initiate this USPS workgroup process, has concluded that the USPS' workgroup concept is not a functional concept for addressing EAS pay policy matters and that the USPS has chosen to violate NAPS' rights as found in;

- **39 U.S. Code § 1004 (b)** The Postal Service shall provide a program for consultation with recognized organizations of supervisory and other managerial personnel who are not subject to collective-bargaining agreements under chapter 12 of this title. Upon presentation of evidence satisfactory to the Postal Service that a supervisory organization represents a majority of supervisors, that an organization (other than an organization representing supervisors) represents at least 20 percent of postmasters, or that a managerial organization (other than an organization representing supervisors or postmasters) represents a substantial percentage of managerial employees, ***such organization or organizations shall be entitled to participate directly in the planning and development of pay policies and schedules, fringe benefit programs, and other programs relating to supervisory and other managerial employees (emphasis added).***

Despite the realization of the continued disengagement by the USPS, NAPS has continued its review of the USPS FY 2022 National Performance Assessment (NPA) goals, thresholds and scorecards. Furthermore, our review also includes the USPS proposed FY 2022 Pay-for-Performance (PFP) 10-cell matrix that were received on February 8, 2022.

NAPS must note, that this review has also been impeded by the USPS' failure to provide critical data needed for NAPS to provide creditable input on the structure of the FY 2022 NPA process. NAPS did utilize the limited data on SPLY actual on some of the targets that was provided by the USPS.

To have a better understanding of the Postal Service's rationale in the development of the FY 2022 NPA and PFP 10-cell matrix, NAPS would have needed the requested data questions that have been delayed and denied by the USPS. Based on the lack of engagement in accordance with 39 U.S. Code § 1004, which has impeded NAPS ability to participate directly in the planning and development of this pay policy, NAPS rejects the USPS FY 2022 National Performance Assessment (NPA) goals, thresholds and scorecards.

Due to the factual statements above, NAPS is requesting the termination of the FY22 PFP process and further requests the USPS institute a three percent (3%) salary increase for All EAS under the nested representation authority of NAPS for FY2022.

NAPS remains interested in engaging the USPS in the workgroup process to immediately begin working on the PFP process for FY2023 and beyond. We look forward to the Postal Service's responses.

Please contact my office if you have any questions of NAPS.

In Solidarity,

Ivan D. Butts

Ivan D. Butts
National President

NAPS Work Group Questions
FY2022 National Performance Assessment (NPA)
10-Cell Pay-For-Performance (PFP)

- In past years, NAPS has received a file with a sheet for each indicator that lists its Description, Measurement Period, Data Source and Calculation (business rule, EDW reports), Data Validation and Applicable Positions (depths and weights). That information was not given to NAPS this year, why?
- What statistical formula or analysis was used to set the goals in each of the ten blocks for every indicator?
- Explain why the stretch from one block to the next block differs from indicator to indicator?
- What mitigation will be offered this year? In the past, only unit mitigation, on unit indicators was allowed by the field. There is very little indicators measured to the unit level in this FY program, so what will be able to be mitigated?
- What historical data was used and how was it used to set the goals in each of the ten blocks for every indicator?
- What is the total revenue goal (dollar amount), for FY22? What was the total revenue goals, dollar amounts, for FY21, FY20 and FY19?
- What is the Total expense goal (dollar amount) for FY22? What was the total expense goals (dollar amounts) for FY21, FY20 and FY19?
- Currently there are zero indicators scored at the UNIT FINANCE number, why? Many indicators are measured at the UNIT FINANCE number levels but not scored at those levels. For Retail and Delivery people, 17% of their composite is based on two national scores, 32% based a three District scores, and 50.5% based on a Lead Finance number scores.
- Service standards were recently changed, reduced, in the fall of 2021, as part of the 10 year Delivering for America Plan. It was said priority would have a goal of 95%. How was the goal of 95% established and what was it based on since there is no historical data to base it on with new network changes etc.?
- With the new Delivering for America plan, priority mail has a goal of 95%, why is a block 5 for Competitive Composite at 95.75% and not 95%?

Additional NAPS Work Group Comments
FY2022 National Performance Assessment (NPA)
10-Cell Pay-For-Performance (PFP)

- NAPS has always said there should be more indicators scored AND weighted heavier to the "UNIT FINANCE" number.
- NAPS does not believe its members should be held accountable for NPA performance scores before any NPA goals were shared with them. In many cases the first scorecard they will see is at a minimum beyond the 1st quarter of the (if not later) and some indicator matrix blocks maybe "out of reach - unattainable" at the that time. That is not a good PFP program.
- Total Accident indicator matrix blocks were developed BEFORE it was determined that employees that test positive for COVID can file a CA-1 accident. This new practice is not factored into historic accident rates and skews this FY accident rates drastically LOWER. The Total Accident indicator matrix is no longer a valid matrix and needs to be changed if COVID 19 CA-1's are included in the scoring for total accidents.
- Completing a final scorecard, using the projected year end numbers given by USPS (in the lower right corner of each indicator slide, would mean a final national scorecard of 4.20. This shows that based off the USPS FY21 actual averages against the FY22 Matrix for each indicator the projected FY22 national scorecard would be at 4.20 not a 5.00. If matrix were set/established properly to last year the scorecard would be a 5.00.