

United States Department of the Interior

OFFICE OF THE SECRETARY Washington, DC 20240

August 21, 2025

PERSONNEL BULLETIN NO. 25-05

SUBJECT: Dual Compensation Waiver for Reemployed Annuitants in Law Enforcement Officer and Related Identified Positions

- **1. Purpose.** This Personnel Bulletin (PB) implements the U.S. Office of Personnel Management's (OPM) delegation of approval authority for Dual Compensation Waivers for Reemployed Annuitants in Law Enforcement Officer and Related identified positions.
- **2. Scope.** This policy applies to the Department's Office of Law Enforcement and Security and the following bureaus: Bureau of Indian Affairs, Bureau of Land Management, Bureau of Reclamation SRF, U.S. Fish and Wildlife Service, and the National Park Service.

This Personnel Bulletin only applies to the following occupational series for all geographic locations and grades:

- 0007 Correctional Officer
- 0025 Park Ranger (Law Enforcement Rangers only)
- 0083 Police
- 0085 Security Guard (Bureau of Reclamation's Security Response Force)
- 1801 General Inspection, Investigation, Enforcement, and Compliance (Includes non-commissioned Wildlife Inspectors in the U.S. Fish and Wildlife Service)
- 1811 Criminal Investigation
- 2151 Dispatching (Specific to Public Safety)
- **3. Authority.** OPM Delegated Authority to The Department of the Interior Direct Threat to Life or Property (Memorandum signed December 23, 2024).
- 4. Policy. The authority to waive the dual compensation reduction (salary off-set) required of reemployed annuitants by sections 8344 and 8468 of title 5, United States Code in connection with protecting public lands is delegated by OPM to the Department of the Interior. This delegation enables the Office of Human Capital (OHC) by delegation of the Department's Chief Human Capital Officer (CHCO) and Deputy Assistant Secretary, Human Capital, Learning and Safety (DAS-HCLS) to waive the salary off-set when necessary to reemploy a Civil Service Retirement System (CSRS) or Federal Employees Retirement System annuitant (FERS) on a temporary basis, but only if, and for so long as, the authority is necessary to immediately and quickly reemploy retired Federal employees needed to ensure safety to visitors and inhabitants of public lands, and protect public lands under Interior's jurisdiction from vandalism and other criminal activity. This delegation is valid from the effective date of this Personnel Bulletin through December 31, 2028, and is subject to the following limitations and requirements:

- The Department's CHCO or DAS-HCLS may waive the salary off-set on a case-by-case basis, when necessary to immediately and quickly hire, on time-limited appointment, an annuitant with optional retirement, excluding annuitants with early voluntary and buyout retirements, for the occupations and positions listed in Section 2 of this Personnel Bulletin. This authority extends to both temporary and term appointments.
- The Department's CHCO or DAS-HCLS may terminate the waiver when the conditions that make the waiver necessary change, when the annuitant leaves the position, when the position or nature of the work changes, when the annuitant reaches the mandatory separation age pursuant to 5 U.S.C. 8335(b)(1), or when the not-to-exceed date is reached.
 - Reemployed Annuitants covered by this Personnel Bulletin can only be employed until the last day of the month they turn 57 years old, if they are in a primary covered mandatory retirement position.
 - The Department will not approve an "until age 60" waiver for individuals in primary covered mandatory retirement position requesting a dual compensation waiver.
 - Reemployed Annuitants being placed in a secondary covered position will not have a mandatory retirement age restriction.
- The Department will not request an OPM repayment waiver for Voluntary Separation Incentive Payments (VISPs) when returning within five (5) years of receiving the VSIP.
- Reemployed annuitants service at the will of the appointment official, per 5 U.S.C. 3323. Bureaus and equivalent Offices may hire annuitants using any appropriate existing appointing authority. The work schedule of annuitants may be adjusted without advanced notice or procedures. Work schedules of these employees cannot exceed forty (40) hours a week/full time.
- Dual compensation waivers made via this authority are available for temporary and term appointments.
- This Personnel Bulletin is not authorized for developmental (i.e., career ladder) appointments.
- The job opportunity announcement must include the following language within the Additional Information section regarding potential application of dual compensation waiver:
 - Certain incentives, such as Salary Offset Waiver or Recruitment or Relocation Incentives, may be authorized to eligible selectees. The decision to offer an incentive will be made on a case-by-case basis and is neither promised nor guaranteed.
- **5. Oversight.** HR offices are required to complete the Department's Dual Compensation Waiver form (or alternative procedure as specified by OHC in subsequent guidance). By completing this form, the HCO is verifying the following requirements:

- The Reemployed Annuitant is being selected from an USAJOBS vacancy announcement.
- The hiring manager must certify all other "Reasonable Staffing" options have been exhausted or why the option is not viable, including the following:
 - Hired all qualified applicants who were referred on USAJOBS Vacancy Announcement that the Reemployed Annuitant is being selected from;
 - Hired all qualified Reemployed Annuitants who are willing to accept the assignment with their salary offset;
 - Offered details, reassignment, voluntary overtime or compensatory time off to qualified employees internal to the bureau or equivalent office; and
 - Review current local organization roster and identify all Reemployed Annuitants
 with current approved Dual Compensation waiver. For the continued support of
 the local organization's mission, the OHC is required to limit the number of Dual
 Compensation waivers per local organization. This is reviewed on a case-by-case
 basis.
- Human Capital Officer (HCO) and OHC are required to maintain a copy of the Department's Dual Compensation Waiver form that has been signed by the Department's OHC for three (3) years following the effective date of the appointment in the USA Staffing Casefile and Reemployed Annuitant's eOPF. The HCOs can submit the Dual Compensation Waiver form without the Reemployed Annuitant's Civil Service Retirement (CSA/CSF) Number, if the Reemployed Annuitant has retired in the last ninety (90) days. However, the Reemployed Annuitant must be informed in writing that they have ninety days from the date of their appointment to provide the HCO with their Civil Service Retirement (CSA/CSF) Number as condition of the waiver. If the number is not provided, the waiver will be terminated on the ninety-first (91st) day with no consideration of reinstatement.
- **6. Requesting.** As a condition of this delegation, all bureaus and equivalent offices must submit a justification memorandum identifying the specific reason(s) for the waiver request and DOI's Dual Compensation Wavier form to the OHC, for each use of this Dual Compensation Waiver authority. The justification memorandum must reflect how all other "Reasonable Staffing" options have been either exhausted or are not a viable option.
- 7. **Inquiries.** Any employee or employee representative seeking further information concerning this policy may contact their Human Capital Officers. Bureau headquarters HR staff may contact the Office of Human Capital at DOI Office of Human Resources@ios.doi.gov.

Jennifer A. Ackerman Acting Deputy Assistant Secretary, Human Capital, Learning and Safety

Attachment:

- OPM's Notification to DOI's Chief Human Capital Officer
- OPM's Delegation of Authority Memorandum to DOI
 DOI's Dual Compensation Waiver form