




# United States Department of the Interior

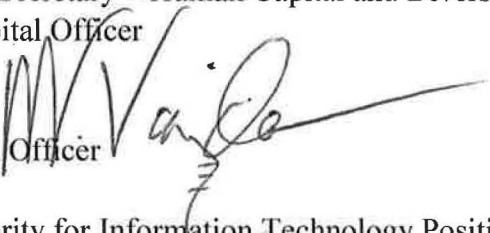
OFFICE OF THE SECRETARY  
Washington, DC 20240

Memorandum

**JUN 10 2019**

To: Bureau Associate Chief Information Officers  
Bureau Human Capital Officers  
Bureau Human Resource Directors

From: *for* Raymond A. Limon   
Deputy Assistant Secretary - Human Capital and Diversity  
Chief Human Capital Officer

William Vajda   
Chief Information Officer

Subject: Direct Hire Authority for Information Technology Positions

The Department of the Interior (DOI) Office of the Chief Information Officer (OCIO) and Office of Human Capital (OHC) are working in partnership to strengthen DOI's strategic competitiveness in recruiting, hiring and retaining individuals with critical information technology (IT) skills.

The U.S. Office of Personnel Management (OPM) recently delegated agency heads with the authority to determine the need and approve the utilization of Direct Hire Authority (DHA) for IT positions. DOI completed a workforce analysis and determined that a critical hiring need exists. We believe the approval of the DHA will better position the DOI's Information Management and Technology (IMT) leadership to address critical workforce needs.

The attached policy establishes the authority to utilize DHA for time-limited appointments within the IT occupational series (2210) across all geographic locations and all grade levels. Bureaus/Offices are reminded that this authority does not change DOI's existing guidance and process that require the OCIO to review and approve all requests to hire IT positions across DOI.

Attachment



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## PERSONNEL BULLETIN NO: 19-07

**SUBJECT:** Direct Hire Authority for Information Technology Positions

**1. Purpose.** This Personnel Bulletin (PB) establishes the authority and necessary guidance for bureaus/offices to utilize the Direct Hiring Authority (DHA) for Information Technology (IT) positions. The U.S. Office of Personnel Management (OPM) issued a final rule authorizing agencies to approve DHA for general schedule (GS) positions that are classified in the 2210 series, provided there is an identifiable shortage of candidates and/or a critical hiring need.

**2. Effective Date.** This policy is effective immediately and will remain in effect until rescinded or superseded.

**3. Authorities.** As authorized in [Federal Register Document 2019-06396](#) (Volume 84, Number 64), which implements changes to 5 CFR 337; and, in accordance with [Executive Order 13833](#) “[Enhancing the Effectiveness of Agency Chief Information Officers](#)” to better position agencies to more efficiently provide modern and secure IT systems and programs in service to the American people, the Department of the Interior (DOI) is authorizing the use of DHA for positions in the Information Technology Management (ITM) series, general schedule (GS)-2210.

**4. Policy.** The Department of the Interior is authorizing the use of DHA for all IT positions in the general schedule (GS)-2210 occupational series, at all grade levels and geographical locations, in accordance with paragraph 6 of this policy. This authorization is based on the existence of a critical hiring need.

The Office of the Chief Information Officer (OCIO) maintains the authority to review and approve all requests to hire IT positions across DOI, following the *Process for Requesting CIO Approval to Hire Information Technology Management Personnel*, as established in Personnel Bulletin 16-05 and consistent with the requirements of the Federal Information Technology Acquisition Reform Act (FITARA).

## **5. Responsibilities.**

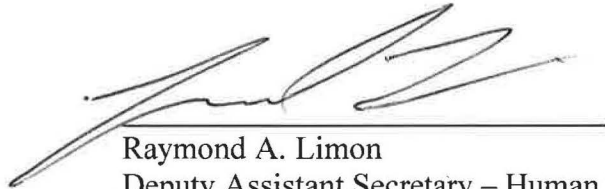
- a. **DOI Office of the Chief Information Officer.** OCIO is responsible for recruiting, retaining and managing DOI’s IT workforce, including establishing a process for vetting requests for appointment extensions under this DHA and making recommendations to the Chief Human Capital Officer (CHCO).
- b. **DOI Office of Human Capital.** OHC is responsible for establishing policy for the utilization of this DHA. OHC will:
  - i. Develop policy governing the implementation and administration of the IT DHA within the Department;
  - ii. Provide the justification used in making the determination of a critical hiring need to OPM; and,

- iii. Review requests from the OCIO to authorize extension of this DHA appointment beyond the initial four (4) year period.
- c. Bureau/Office Servicing Human Resources Offices (SHRO). SHROs are responsible for administering the IT DHA within Bureaus and supported Offices. SHROs will:
  - i. Implement guidance and processes to ensure compliance and integrity of the recruitment and hiring process with appropriate policies, regulations, and other directives and agreements;
  - ii. Advise and assist hiring officials/managers and supervisors in utilization of the IT DHA in accordance with this policy;
  - iii. Keep record of use of the IT DHA and provide information within five (5) days of request to the OHC; and
  - iv. Review and determine eligibility based on documentation provided by the applicant;

**6. Appointment.** Appointments under this authority may be for a period of more than one (1) year, but not more than four (4) years. DOI may extend an appointment up to four (4) additional years, if the DHA remains in effect. Bureau Associate Chief Information Officers must request extensions through the OCIO. The CHCO is the approval authority for all extensions exceeding the four (4) year initial appointment. No individual may serve more than eight (8) years under this appointment. In addition, individuals hired under this DHA may not be transferred to a position that is not an IT position.

When using this direct hire authority, the SHRO must use authority code “AYM” in item 5-C and the secondary authority code “BYO” in item 5-E of the Standard Form 50 Notification of Personnel Action (SF-50).

**7. Oversight and Review Requirements.** Bureau/Office SHROs must maintain case records of any individual hired under this authority, and must provide information upon request from the OHC. OHC will conduct annual reviews to ensure the continued need exists for use of this DHA.



Raymond A. Limon  
Deputy Assistant Secretary – Human Capital  
and Diversity  
Chief Human Capital Officer



## Direct Hire Authority for Information Technology Positions: Supporting Evidence

- (1) *Positions that must be filled.* All GS-2210 Information Technology Management (ITM) positions for all grade levels, and, for all geographic locations (i.e. Unified Regions).
- (2) *The event or circumstance that has created the need to fill the positions.* At the time of this policy issuance, nearly 20% of the ITM employees are eligible for retirement. Within 5 years, 40% of the Department of the Interior (DOI) GS-2210 employees will be eligible for retirement. This means that of the 1919 Federal staff currently employed in the GS-2210 series, DOI might expect to recruit for and hire over 300 staff in this occupational series within the next year; and, up to almost 800 positions within the next five years (see table A.1).

### A.1. Retirement Eligibility for GS-2210 Current Employees

Series/Title	Retirement Eligible Now (as of April 2019)	Retirement Eligible within 1 Calendar Year	Retirement Eligible within 1 to 5 Calendar Years	Total GS-2210 Employees (as of April 2019)
2210 - Information Technology Management	337 (see A.3 to support high probability)	71	361	1919
Percent (%) of total GS-2210 Employees eligible to retire	18%	4%	19%	
Cumulative Percent (%)	18%	21%	40%	

At a minimum, and based on historical retirement data for the GS-2210 series, employees have worked nearly three years after being eligible before retiring. Based on this historical trend, the probability is high that DOI can expect to recruit for, and hire, approximately 200 employees at any time. Within the next three years, DOI can expect to realize an additional 200 employees that may retire at any time, within the GS-2210 series (see tables A.2 and A.3).

## A.2. Average Length of Eligibility at Time of Retirement

Fiscal Year	Average Length of Retirement Eligibility
2015	2.1
2016	3.4
2017	3.1
2018	2.9
2019	3.8
<b>Total</b>	<b>2.9</b>

## A.3 Number of Years Eligible to Retire (Probability of Realizing Risk = High)

Employees who have been eligible to retire for at least three years															In 3 years, would have been eligible for 5 years	In 3 years, would have been eligible for 4 years	In 3 years, would have been eligible for 3 years	
# of Years Eligible	-19	-16	-15	-14	-13	-12	-11	-10	-9	-8	-7	-6	-5	-4	-3	-2	-1	0
2210	2	1	1	1	1	7	7	5	10	15	18	22	36	35	51	59	68	71
INFORMATION TECHNOLOGY MANAGMENT	2	1	1	1	1	7	7	5	10	15	18	22	36	35	51	59	68	71
Eligible Now	2	1	1	1	1	7	7	5	10	15	18	22	36	35	50	59	67	
Eligible Within One Calendar Year																		71
Next 1 to 5 Years																		
Grand Total	2	1	1	1	1	7	7	5	10	15	18	22	36	35	51	59	68	71
Eligible Now																		337
How many of those eligible to retire now have already stayed at least 3 years post eligibility timeframe																		211
How many more positions within the next three years will have been retirement-eligible for at least three years?																		197

This does not include the recruitment needs for regular turnover for non-retirement eligible employees. Over the past four years (fiscal years 2015 to 2018) GS-2210 separations have outpaced incoming employees. While the delta between accessions and separations is not large (approximately 20 more separations than accessions), cumulatively the delta (115 more separations than accessions over five years) compounds the recruiting needs for the GS-2210 series (See table A.4). As well, over a 30 month period, DOI loses about 20% of new employees in the GS-2210 series, based on an analysis of employees hired at the beginning of FY17 who remain employees of DOI currently (See table A.5).

#### A.4. Accessions & Separations, GS-2210 by FY

Row Labels	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	Total	3 year average (FY 2016 - FY 2018)	4 year average (FY 2015 - FY 2018)
IT Management Accessions	96	169	122	114	38	539	135	125
IT Management Separations	136	144	132	170	72	654	149	146
Delta (Net Losses)	40	-25	10	56	34	115		
Cumulative Delta (Cumulative Net Losses)	40	15	25	81	115			

#### A.5. 30-month Retention Rate, GS-2210 series

Starting Count (Arrived in October 2017)	22 FTE
Ending Count (Remain active employee as of March 2019)	17 FTE
Retention Rate (30-month)	77%

The challenges faced at DOI with respect to ensuring secure and reliable operations require a stable and ready workforce. DOI has been working diligently to respond to the Office of the Inspector General recommendations for improving the maturity of incident response analysis and remediation. Many of these recommendations can be traced back to inadequate staffing across the GS-2210 series, causing high workload volume that leads to an emphasis on service restoration rather than assessment, remediation and response that would comply with NIST guidance (see, “Office of the Inspector General, U.S. Department of the Interior, *Interior Incident Response Program Calls for Improvement Evaluation*” ([Report No.: 2016-ITA-020](#)))

While a large number of retirement-eligible (GS)-2210 employees fall within the grade levels of 11 through 15, DOI recommends that this hiring authority be leveraged across all grade levels. This is based on proven workforce development strategies that combine entry-level, mid-level, and senior staff, to promote mentoring, growth and development opportunities. DOI does not assume that it is necessary to replace the exact grade levels that are slated for retirement, and feels it would be prudent to leave the options on the table to allow for strategic staffing, both in grade level and in geographic location. As well, the pace of

technology advancements necessitates a shift to more diverse talent that can be groomed to support DOI initiatives, such as high performance virtual computing (see tables A.6 and A.7).

#### A.6. Retirement Eligibility by Grade Level

<b>GS-2210 Series, Grade Level</b>	<b>Retirement Eligible Now (as of April 2019)</b>	<b>Retirement Eligible within 1 Calendar Year</b>	<b>Retirement Eligible within 1 to 5 Calendar Years</b>
00	4	2	6
02			
03			
04			
05			
06			
07	1		2
09	22	1	28
11	56	18	53
12	106	19	108
13	92	18	100
14	41	10	51
15	15	3	13
<b>Total</b>	<b>337</b>	<b>71</b>	<b>361</b>



A.7. Retirement Eligibility by Geographic Location (Coverage Recommended for all Regions)

<b>Series/Unified Region</b>	<b>Retirement Eligible Now (as of April 2019)</b>	<b>Retirement Eligible within 1 Calendar Year</b>	<b>Retirement Eligible within 1 to 5 Calendar Years</b>
<b>2210</b>	<b>337</b>	<b>71</b>	<b>361</b>
Region 01 - North Atlantic-Appalachian	91	24	73
Region 02 - South Atlantic Gulf	9	3	31
Region 03 - Great Lakes	11	2	9
Region 04 - Mississippi Basin	17	2	20
Region 05 - Missouri Basin	10	2	11
Region 06 - Arkansas-Rio Grande-Texas-Gulf	5	3	3
Region 07 - Upper Colorado Basin	91	18	113
Region 08 - Lower Colorado Basin	22	3	11
Region 09 - Columbia-Pacific Northwest	34	7	48
Region 10 - California-Great Basin	31	3	30
Region 11 - Alaska	16	3	11
Region 12 - Pacific Islands		1	1



- (3) *The duration for which the critical hiring need is expected to exist.* This critical hiring need is anticipated to be in effect for at least three years, during which time 18-21 percent (over 400) of GS-2210 positions may be vacated due to retirement; and, potentially up to eight years (three years past the “eligible to retire” year for employees eligible within the next five years) when 40 percent (over 750) of the GS-2210 positions may be vacated due to retirement. Notwithstanding, the anticipated duration of the need, DOI will annually conduct analyses and will re-validate or retract this policy authority as necessary.