



UNITED STATES
OFFICE OF PERSONNEL MANAGEMENT
WASHINGTON, DC 20415-1000

OFFICE OF THE DIRECTOR

JUL 19 2002

The Honorable Lane Evans
Ranking Minority Member
Committee on Veterans' Affairs
United States House of Representatives
335 Cannon House Office Building
Washington, DC 20515

Dear Congressman Evans:

Thank you for your letter dated April 4, 2002, in which you inquired about the Office of Personnel Management's (OPM's) rationale for directing that hiring agencies should issue only one certificate of eligibles for a single interdisciplinary position. I apologize for the delay in responding.

As background, an interdisciplinary position is one involving duties and responsibilities closely related to more than one occupation. As a result, the position could be in either of two or more occupational series. The nature of the work is such that individuals with education and experience in either of two or more professions may be considered equally well qualified. For example, a position requiring research work in the environmental responses of certain living organisms may be filled by an employee trained in either biology or physiology.

Issuing two certificates in a situation such as this, one for a biologist and one for a physiologist, can, in some circumstances, present an opportunity for misuse without advancing any practical goal. Instructing agencies to issue only one certificate for an interdisciplinary position is one way to provide safeguards against misuse, including violations of veterans' preference laws, and to promote compliance with merit system principles. In short, our rationale for directing hiring agencies to issue single certificates for interdisciplinary positions reflects our strong support for the fair and equitable treatment of all applicants.

Because there are relatively few interdisciplinary positions Governmentwide, agencies are generally not familiar with them. Therefore, in updating our delegated examining guidance on how to refer candidates, we clarified the procedures agencies should use to fill these unique positions. Before preparing policy or procedural guidance, it is not unusual for program offices to ask the Office of the General Counsel for assistance. In this case, the Employment Service asked if it was permissible to instruct delegated examining offices not to create multiple registers when conducting competitive examining for a single interdisciplinary position. In response, General Counsel staff indicated that such guidance did not run afoul of the law, and, therefore, was a permissible policy choice.

Contrary to the statement in the OPM study, *Veterans: Getting Their Preference*, however, the General Counsel did not state that issuing multiple certificates for single interdisciplinary positions violated the Veterans' Preference Act. We regret any confusion the misstatement in this study's introduction may have caused.

As always, I appreciate the opportunity to respond to your concerns. Should you have any questions about the foregoing, please do not hesitate to contact me. We will be happy to brief you or your staff on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Kay Coles James". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kay Coles James
Director

cc: Len Sistik, Staff Director
Oversight and Investigations Subcommittee