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TO: CAPT Carlos Plasencia
Director, Program Evaluation and Oversight Division
Office of Commissioned Corps Force Management

FROM: CDR Patty Garvey, R.Ph.
Chair, Pharmacist Professional Advisory Committee (PharmPAC)

SUBJECT: Proposed New COER

The Pharmacist Professional Advisory Committee (PharmPAC) has reviewed the proposed new COER and offers the following comments:

1. The new number scales should offer more range for scores and simplify any confusion from the old letter scores.
2. Proposed system change No. 3 - (From a BOP perspective but believe these comments would apply to some other settings as well) - in the BOP, the reviewing official is usually either an associate warden or a warden - they are almost always civil service workers, are very busy, and usually do not have a very good understanding of the PHS personnel system or our COER. At times, it is very difficult to have them complete the required COER tasks in a meaningful and timely fashion under the current COER system. There is also, at times, a poor working relationship between rater and reviewing official. There may be difficulty in requiring the BOP to include a rater's rating in a civil service employee's personnel file. Requiring a reviewing official to rate a rater could adversely affect the officer's COER in the following ways:
 - contributing to further delays in completion of the COER
 - adding more responsibility to a disinterested party
 - potential misuse of the "rating a rater" system to adversely effect a rater
 - if the rating of the rater is not included in the rater's personnel file, then the effort is wasted; if it is, there could be potential retribution to the officer from the rater if the rater is not happy with the reviewing official's rating
3. Proposed system change No. 4 - should specify responsibility for the provider and resources for the education of the officer and the supervisor. As stated, it is too general and will not get accomplished.
4. Proposed system change No. 6 - strengths and areas of improvement dialogue between officer and rater would be better served at a time prior to the COER in a timely manner so as the officer would have time to make changes prior to the COER evaluation.

5. The new COER format does not address the problems that we have had with our evaluation process. Inflation will still be a concern and the COER still has a bias for Officers in supervisory roles.
 - A N/A (not applicable) option must be included in the two questions asking the Rater to evaluate the Officer's supervisory ability. Many officers do not have supervisory roles and are not able to be rated on this skill.
 - Suggest adopting the Air Force evaluation scoring of a Pass/Fail strategy; an officer either Meets Standards or Does Not Meet Standards. This would eliminate the problem of grading inflation and the promotion results would be need to be based on the Officer's duties and accomplishments and not a report card score.
6. Concerned that the raters will not take the time to offer commentary, and perhaps not adequately describing accomplishments of the officer.
7. Lack of attachments I and II substantially limit ability of rater to separate responsibilities of officer – to the Corps and to the Agency (as they are often not one-in-the-same) as well as describe accomplishments. Proposed new format will only allow raters to comment/justify a specific tenet within the COER, which does not really offer a good picture of what the officer does as well as what s/he can do for the agency/Corps. As well, the attachment is the only place to fluidly discuss officers in the same category but from different agencies and rate them accordingly.
8. The Army including their values and how officers were doing in representing those values might be a good thing to include in some way. There doesn't seem to be a place to show the spirit of the Corps and how we are promoting our mission. It is suggested that we move more toward “satisfactory” and “non-satisfactory” like the Air Force and others.