



Department of Energy

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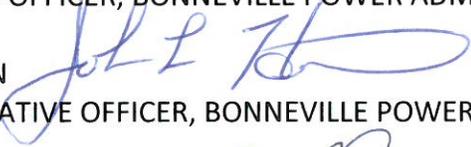
JAN 26 2015

In reply refer to: A-7

MEMORANDUM FOR ELLIOT E. MAINZER, ADMINISTRATOR and CHIEF EXECUTIVE OFFICER,
BONNEVILLE POWER ADMINISTRATION

THROUGH:

CLAUDIA R. ANDREWS 
CHIEF OPERATING OFFICER, BONNEVILLE POWER ADMINISTRATION

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FROM:

BRIAN E. CARTER 
HUMAN RESOURCES OFFICER, BONNEVILLE POWER ADMINISTRATION

SUBJECT:

DIRECTIVES EQUIVALENCY APPROVAL MEMORANDUM

PURPOSE: To document BPA's equivalencies for some sections of DOE Order 322.1C, *Pay and Leave Administration and Hours of Duty*.

BACKGROUND: BPA has not traditionally followed DOE Order 322.1C, *Pay and Leave Administration and Hours of Duty*. BPA is exempted per section 3c(2) of the Order. As part of BPA's Human Capital Management 2014 "Get Well" plan and efforts, this exemption was reviewed, and the determination was made that BPA would no longer be exempt from this Order in its entirety. It was determined that BPA would be exempt from section 4c(1) of the Order. In several other sections, the Order references the Automated Time Attendance and Production System (ATAAPS). ATAAPS is an employee time keeping that BPA does not use. BPA should be exempted from the sections referencing ATAAPS. This memo documents the rationale for this exclusion and describes the equivalencies that exist to assure that BPA is following all applicable laws and regulations.

JUSTIFICATION: BPA's equivalency is BPA HR Directives 005, *Employee Pay and Compensation Incentives* and BPA HR Directive 006, *Employee Leave, Work Schedules & Telework*. These BPA HR directives are consistent with the provisions of DOE Order 322.1C, with a few exceptions. Section 4c(1) establishes a specific administrative workweek. However, BPA and its unions have negotiated administrative workweeks, in compliance with Title 5, that differs from the workweek defined in the Order primarily so that shifts aren't split between pay periods. DOE's Office of Human Capital Management has concurred with BPA's establishment of a different administrative workweek.

Additionally, section 4d(3) states that advanced sick leave documentation must be provided to "the DOE Payroll Team prior to certification of the leave in the Automated Time and Attendance and Production System (ATAAPS). BPA's payroll is managed internally by its Finance function, with no interaction with the DOE Payroll Team, and BPA does not use ATAAPS. BPA HR Directive 006's equivalent provision states the same requirement, except with references to BPA's payroll office and BPA's timekeeping system and the record-keeping requirement is assigned to the timekeeper rather than the payroll office.

Likewise, section 4j(5) requires supervisors "ensure that all flexiplace/telework hours are properly recorded in ATAAPS each pay period", and section 4k(2) requires timekeepers "record data in ATAAPS . . .". Since BPA does not use ATAAPS, BPA should be exempted from these sections. BPA HR Directive 006 provides equivalent provisions, replacing ATAAPS with Human Resources Management Information Systems (HRMIS).

RECOMMENDATION: Recommend that you approve this equivalency document.

Elliot E. Mainzer, Administrator and Chief Executive Officer, Bonneville Power Administration

APPROVE:  DISAPPROVE: _____ DATE: 4/26/16

CONCURRENCES/ CONSULTATIONS: Rita Clinton
Director, Office of Human Capital Policy, Accountability and Technology

cc:

Janet Herrin
Senior Advisor, Power Marketing Administration, Department of Energy