Army Civilians--Professionals By Any Definition
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Introduction

George Washington formed a Continental Army of ordinary Civilians who were willing to do whatever was necessary to make the country free. Since the Army transitioned from a conscript to a professional volunteer force, Army Civilians have assumed increased levels of responsibility and greater authority. Civilians have been held to higher standards of accountability at Commands, Headquarters, installations, and in other organizations. By early 2010, some 340,000 Army Civilians were serving in 540+ occupational fields. Of that number, 23,000 have been deployed to the conflicts in Afghanistan and Iraq.¹

What Characteristics Distinguish a Profession Today?

Professionals view their work not simply as a vocation for earning money, but as a calling which has for its prime purpose the rendering of some form of public service. Doctors, priests, lawyers, and educators are common examples. Samuel P. Huntington's The Soldier and the State: The Theory and Politics of Civil Military Relations² and FM1 are illustrative of the literature on professionalism. Huntington defined the military profession using three particular characteristics: expertise, responsibility, and corporateness. Expertise includes a liberal arts education “followed by ongoing technical training staged to coincide with specific ranks and skill sets.”³ Responsibility is service to society, not for compensation, but “as the fulfillment of a service ethic shaped by professional values and ideals.”⁴ Corporateness, or group identity and unity, “develops through shared training and educational experiences, common work obligations, and the profession's unique social responsibility.”

The June 14, 2005 edition of the The Army Field Manual--considered one of the Army's two capstone field manuals--defined “profession” as follows:

“"The purpose of any profession is to serve society by effectively delivering a necessary and useful specialized service. To fulfill those societal needs, professions--such as, medicine, law, the clergy, and the military--develop and maintain distinct bodies of specialized knowledge and impart expertise through formal, theoretical, and practical education. Each profession establishes a unique subculture that distinguishes practitioners from the society they serve while supporting and enhancing that society. Professions create their own standards of performance and codes of ethics to maintain their effectiveness. To that end, they develop particular vocabularies, establish journals, and sometimes adopt distinct forms of dress. In exchange for holding their membership to high technical and ethical standards, society grants professionals a great deal of autonomy. However, the profession of arms is different from other professions, both as an institution and with respect to its individual members."⁵

This excerpt from FM 1 highlights three distinguishing attributes of a profession: (1) delivery of a specialized service to address societal needs, (2) the establishment of a distinct subculture, and (3) the definition of performance standards and a code of ethics.
For the purposes of the discussion here, we will examine the attributes of Army Civilians within the context of the common attributes that span across the above definitions:

- Commitment to service
- Corporateness
- Distinct bodies of knowledge
- Delivery of specialized service using specialized skills
- Ability to apply specialized knowledge and render complex judgments under conditions of uncertainty
- Expertise imparted through formal, theoretical, and practical education
- Accountability of members to high ethical and performance standards
- Significant autonomy

How Do Army Civilians Embody the Attributes of a Professional?

Commitment to service. In answering the question of what it means today to be a professional Civilian public servant in the Army, we turn first to the question of responsibility.

As Federal Civil Service employees, Army Civilians take the same oath of office as Army Officers and Members of Congress, solemnly swearing that they will support and defend the Constitution. In doing so, they affirm their commitment to “uphold the highest traditions of the public service”\(^6\), their loyalty to the United States, and their obligations to the American people. Paul A. Volcker, former Chair, National Commission on the Public Service, described a civil service that upholds the highest ideals as one that is “responsive to the political will of the people,” “protective of our constitutional values,” “able to cope with complexity and conflict,” “able to maintain ethical standards,” and “capable of earning the respect of all our citizens.”\(^7\)

The Army values of loyalty, duty, respect, selfless service, honor, integrity, and personal courage guide the conduct of all members of the Army profession, including Army Civilians. The Army Civilian Corps Creed also embodies a commitment to selfless service. The Creed may be viewed as a contract between the Army Civilian and the Army, our Nation, and its citizens.

**Army Civilian Corps Creed**

- I am an Army Civilian; a member of the Army Team
- I am dedicated to our Army, our Soldiers and Civilians
- I will always support the mission
- I provide stability and continuity during war and peace
- I support and defend the Constitution of the United States and consider it an honor to serve our Nation and our Army
- I live the Army values of Loyalty, Duty, Respect, Selfless Service, Honor, Integrity, and Personal Courage
I am an Army Civilian

The Army is the client serviced by the Army Civilian Corps and the nation’s citizenry is its ultimate client. Recent pronouncements by the senior Army leadership make it clear that our client views the Corps as a profession. In a June 19, 2006 memorandum, the Secretary of the Army affirmed that “the Army Civilian Corps is vital to our nation’s security and critical to the Army’s success in peace and war.” The Under Secretary of the Army, Dr. Joseph W. Westphal, has acknowledged that Civilians represent “a huge part of our Generating Force – 60%, in fact.” He recognizes their significant contributions to the Army: “The Generating Force performs the incredible heavy lifting in support of ARFORGEN – training, supplying, and engineering the Force so our Warfighters can concentrate on their missions on the fronts, and come home safely to their families, homes, and communities across the nation.” Furthermore, Dr. Westphal has noted that “the Army is increasingly calling upon our Civilian Corps to assume greater levels of responsibility and accountability at organizations throughout our Service.”

The 2010 Army Posture Statement also acknowledges Army Civilians as an important component of the Army Total Force – “Army Civilians are integral to the Army team, critical to the Army’s success, and thus ultimately, vital to the Nation’s security.”

**Corporateness.** The Army Civilian Creed and Army Values tie Army Civilians to a collective identity that reflects the Army’s culture, character, and core values. As noted in the 2010 U.S. Army Posture Statement, the Creed highlights the unique social responsibility of Army Civilians — namely, to “keep the U.S. Army ready to execute its mission.”

Several developments over the past decade have strengthened the group identity of Army Civilians. To signal the “Army’s commitment to fully integrate Civilians into the Army” and to strengthen the bonds between uniformed and Civilian members of the Army, the Secretary of the Army (SA) and Chief of Staff of the Army (CSA) have established a Civilian Advisory Board. In a memorandum issued on 19 June 2006, they also announced the establishment of the Army Civilian Corps as “an integral part of our Army team.” With the stroke of a pen, the SA/CSA unified the 300,000 Civilians who support the Army in a broad range of capacities under a collective professional identity. To demonstrate its importance to the Army, the Secretary designated himself as the Army Civilian Corps Champion.

**Distinct bodies of knowledge.** An Army standard set of leader competencies are provided through the Civilian Education System (CES), a progressive, sequential leader development program for Army civilians at all levels. All new Army Civilians are indoctrinated into the Army culture, operating practices, and foundational competencies by attending the Foundation Course. AR 350-1 requires each Army organization to provide its Civilians with acculturation experience. Select Civilians serving in or selected for force management related assignments across the Army attend The Army Force Management School. The school develops and maintains a unique body of knowledge on how the Army runs makes that knowledge accessible to all Army cohorts. Students may apply this knowledge to “assist in the management of organizations in the current force (projection Army) and the future force (modularity).” Senior Civilians selected to attend the Army War College are introduced to capstone knowledge unique to the Army, including “the functioning and relationships of numerous Defense, Joint, and Army organization, systems, and processes involved in the development and sustainment of trained and ready forces.”

**Delivery of specialized service using specialized skills.** Under the merit-based Federal Civil Service system that was established as a result of the Pendleton Act of 1883, all civil servants -- including Army Civilians -- are selected for positions based on their specialized knowledge,
skills, and abilities. The Pendleton Act brought an end to the “spoils system,” which had previously placed political patronage above merit in hiring decisions. The introduction of this legislation represented an initial step towards the professionalization of the Federal Civil Service. Appointed by President Benjamin Harrison in 1889 as the first U.S. Civil Service Commissioner, Theodore Roosevelt energized a civil service system that was underpinned by the principle that candidates for positions in the government would be evaluated on a non-partisan, merit basis – “only those who had merit [would] be appointed to Federal jobs.” Under the current system, applicant qualifications are evaluated in the context of the requirements of the job to be filled.

The Army’s 340,000 Civilians perform in 700 Army Civilian job series across 59 Civilian career fields. Army Civilians provide a broad range of specialized services and capabilities.

**Ability to apply specialized knowledge and render complex judgments under conditions of uncertainty.** As defense leaders have reoriented the Army to confront the national security requirements of the 21st century and prevail against a full spectrum of possible threats, they have called upon Army Civilians to exercise agility, adaptability, and flexibility in support of the current conflicts and to prepare for unforeseen future threats arising from the uncertainty of a highly complex security environment.

In the memorandum issued on 19 June 2006, the Secretary of the Army and Chief of Staff of the Army acknowledged the increasingly multi-faceted roles which have been assumed by Army Civilians: “As the Army’s missions have evolved and become more complex, so have the roles of Army Civilians.” Today, Army Civilians occupy senior leadership and mission critical positions in the operating force deployed alongside soldiers, and key positions in the generating force at all levels. At a panel discussion hosted by the Association of the U.S. Army (AUSA) at its Annual Meeting on October 7, 2009, Thomas R. Lamont, the Assistant Secretary of the Army for Manpower and Reserve Affairs (ASA (M&RA)) noted that “Our Army in many cases is supported by Civilians, equipped by Civilians, transported by Civilians, and led by Civilians. This support happens both here in CONUS and overseas to include Iraq and Afghanistan.”

Three examples of individual Army Civilian professionals are illustrative.

- In May 2010, the Secretary of the Army presented the Decoration for Exceptional Civilian Service to William Weed, Medical Communications for Combat Casualty Care Program Management and Business Transformation Director. The award was made for Weed’s development of an electronic medical recording system—a breakthrough technology that operates in the war zone in Iraq and Afghanistan [that] enables the doctors and nurses in theater to document health care electronically for our soldiers.

- Civilian professionals have assisted in humanitarian efforts in Haiti. "Army Materiel Command (AMC) - Haiti Soldiers and Civilians supporting the humanitarian assistance mission have achieved tremendous success providing logistical support not only to our service members, but also to non-governmental organizations such as United States Agency for International Development."

- According to Major General Steven W. Smith, Director, Army Cyberspace Task Force, Army Civilian professionals work shoulder to shoulder with Soldiers at the newly established Army Forces Cyber Command based at Fort Belvoir, VA serving as “the front line of defense for defending the Army network worldwide.”
Expertise imparted through formal, theoretical, and practical education. Since the inception of Operation Enduring Freedom in October 2001, the Army has invested significantly in developing the leadership skills of its Civilians “to provide a more professional, capable, and agile Civilian Corps critical to the Army’s mission.” A memorandum by Lieutenant General James J. Lovelace, Deputy Chief of Staff, G-3/5/7 dated 24 October 2005, signaled an affirmation of the Army’s commitment to the education and training of its Civilian workforce: “Civilian leaders [will] have a much greater role in the future, requiring them to be even more adaptive leaders. The preparation of Civilians for successive leadership responsibility is critical...I strongly endorse training and education for Army Civilians.”

The Civilian Education System was established on 22 January 2007. The goal of the CES is to prepare agile and innovative Army civilians who can lead during times of change and uncertainty; are prepared for the rigors of service as multi-skilled leaders; and are armed with the values, skills and mindset to serve as competent, resilient supervisors and managers. CES “focuses on leadership competencies required at each level of responsibility and assignment as Civilians advance through their careers.” Select Civilians are offered opportunities to attend a Senior Service College, the Defense Senior Leader Development Program, and other senior-level leader development programs to gain a broader work experience to round out their leadership skills through a competitive process.

The Army has also taken actions to sharpen the technical and functional capabilities of its Civilians. Through the Competitive Professional Development and the Academic Degree training programs, eligible Civilians can enroll in formal programs of study in fields that relate to the performance of their job duties. The Army Initiative 5 Final Report “directed the Army to maximize the use of TRADOC schools for Civilian functional training” and the “transfer of responsibility of functional training from Army G-1 to the Army G-3/5/7.” TRADOC operates 32 schools across 16 installations. According to the 2010 U.S. Army Posture Statement, “the Army is working to establish a Civilian training system synchronized with the uniformed military system and expanding Civilian career field functional training requirements to include all applicable Civilian occupational series.”

Accountability of members to high ethical and performance standards. Army Civilians are governed by the same high standards as Military Officers. The Joint Ethics Regulation provides guidance in the areas of financial and employment disclosure systems, post-employment rules, enforcement, and training, and other applicable laws and regulations. In accordance with Section 1-413 of the Regulation, the Inspector General (IG) “investigates ethics matters…and refers any such matters that involve suspected criminal violations to the appropriate criminal investigative office.” The IG subsequently reports on “investigations that result in referrals to the Department of Justice (DoJ) and on disciplinary actions that must be reported in response to the Office of General Counsel (OGC) annual ethics survey.” AR 20-1 prescribes duties, missions, standards, and requirements for inspectors general (IGs) throughout the Army, and guides them in the fulfillment of statutorily mandated self-policing functions.

As government professionals, Army Civilians have “obligations to the highest standards of performance.” The obligations entail “a commitment by civil servants...to efficiency, responsiveness, and integrity.” All Army Civilians are formally held accountable to meet performance standards through a performance evaluation system such as the Total Army Performance Evaluation System (TAPES), as codified in AR 690-400.

Significant autonomy. Army Civilians have already been granted significant autonomy to make decisions of strategic importance to the Army. Over 3,000 Army Civilians operating at the GS-15 level shoulder responsibilities and exercise decision-making authority commensurate
with Army colonels. A number of Army Commands are staffed predominantly by Civilians. The U.S. Army Combined Arms Center, the U.S. Army Materiel Command, and the U.S. Army Installation Management Command have designated Civilians to serve as the second or third ranking senior officials of their respective organizations.

For all of the reasons set forth above, it is clear that as we enter the second decade of the 21st century, Army Civilians are professionals--by any definition. It is, of course, important to recognize that within the Army Civilian profession, some members are also members of other professions. Because of their expertise or experience, yet others are rightly considered to be more senior professionals.

### Complementary Professions

Two examples suffice to illustrate how the separate professional status of certain Army Civilians complements their work for the Army.

Army Civilian attorneys are members of the legal profession as well as members of the Army Civilian Corps. They adapt their legal education and experience to address the unique legal challenges confronted by the Army. In addition to the ethical and other obligations which must be met by all Army Civilians, Army Civilian lawyers must comply with the ethical, continuing legal education, and other obligations of the legal profession.

Civilian faculty members at the Army War College and the U.S. Army Command and General Staff College (CGSC) are also members of the education profession. The *Title 10 Civilian Faculty Manual* published by CGSC prescribes guidelines for the recruitment, appointment, academic credentialing, faculty performance management, promotion, reward, and termination of Title 10 Civilian faculty. “Sustained excellence in teaching” is cited as the most important task for faculty. CGSC has identified the professional domains of its faculty as teaching, scholarship, service, and faculty development. While each faculty member has unique educational credentials, “the common ground for all is that excellence in teaching is required.” Faculty members are “responsible for their development as educators,” and are encouraged to be actively engaged in CGSC-sponsored faculty development programs and pursue self-development opportunities to enhance their effectiveness as teachers.

### Raising the Level of Professionalism

Professionalism is not a static attribute. Members of a profession must continually work to improve the quality of their work. Thus, senior Army Civilians, as well as junior Army Civilians, seek additional or improved expertise and broader experience, all of which benefits the Army.

Some Army organizations have worked to significantly enhance the professionalism of Civilians. Winners of the *2009 Excellence in Education Award*, sponsored in part by the Army Management Staff College, have been recognized for “strengthening the core attributes of the Army workforce through innovation in education, aggressive and creative professional development programs, and a unique emphasis in lifelong learning.” Examples of best practices adopted by the first, second, and third place winners include the following:
The U.S. Army Natick Soldier Research Development and Engineering Center (NSRDEC) has embraced the concept of a continuum of professional development that begins in the formative years and continues throughout a Civilian’s career. NSRDEC has defined leadership competencies for its team leaders, division chiefs, and directors. Skills training, developmental rotations, and opportunities to earn advanced degrees and certifications contribute toward the development of Civilians equipped with specialized capabilities required to solve Army problems. NSRDEC conducts Quarterly Internal Reviews, which provide its senior leadership with visibility into science, technology, and engineering efforts underway. It also convenes peer reviews, where NSRDEC seeks “unbiased insight and guidance about the technical quality, maturity, and relevance of [its] basic research program”\textsuperscript{46} from external sources.

The U.S. Army Audit Agency prepares its 600+ Civilian employees with the skills required to deliver audit services to the Army leadership. The Agency also offers training to strengthen the auditing skills of its auditors at every level. The Agency sponsors select employees for advanced degrees, certifications, and memberships in professional organizations. It “incorporates lessons learned from peer reviews, follow-up reviews, internal quality assurance engagements, and internal control reviews”\textsuperscript{47} and corrects the weaknesses identified.

The U.S. Army Contracting Command TACOM Contracting Center has invested in the development of specialized expertise and the creation of self-policing mechanisms to hold its workforce accountable to high ethical and performance standards. Interns, which represent 45% of its workforce, go through a Buyer Boot Camp that strengthens their job-readiness. Journeymen and senior contracting personnel attend refresher training.

**Commitment to service**

There are, of course, many other ways to raise the standard of professionalism within the Army Civilian Corps. We are limited only by our imagination. Several ideas are currently under discussion.

To enhance commitment to service, some—but not all—organizations arrange for Civilians to take the oath of office in formal induction ceremonies presided by a senior Army official and to renew the oath at key milestones throughout their career. Policy changes could require initial entry and promotions to be more formal to reinforce the oath of office.

History is an excellent vehicle for providing examples and inspiration to professionals. Profiling distinguished Civilians who embody the highest ideals of public service in support of the Army mission could reinforce the service ethic.

**Corporateness**

The National Defense Authorization Act (NDAA) for Fiscal Year 2010 directed acculturation training for all Army Civilians. The Army G-3/5/7 has planned to deploy a program to facilitate the on-boarding of all civilians beginning in 2012.

Many Army organizations are comprised of a mix of Uniformed and Civilian personnel. Both Uniformed and Civilian members of these teams lament the lack of early opportunities to collaborate. Army schools provide excellent opportunities for soldiers and Civilians to learn together, to exchange ideas, and to address problems from a multi-dimensional perspective.
Providing administrative tools for more Army Civilians to attend appropriate TRADOC courses could be beneficial.

Army Civilians receive much of their professional information from proponents. Civilian functional proponents can use their communication vehicles to share Army enterprise knowledge. Departmental issues and priorities are more open and available than ever before via Army Knowledge Online and the Army Public Affairs website.

Distinct bodies of knowledge

The Army Civilian Corps has a unique knowledge domain. Many areas of Civilian knowledge are defined by legislation. Title IX describes critical functions. Other laws prescribe acquisition, intelligence, or other functions. The Army itself, however, prescribes the areas of expertise common to all leaders and managers. Greater clarity regarding common standards for career progression would enhance the Army Civilian profession.

The National Defense Authorization Act for Fiscal Year 2009 directed that all Department of Defense (DoD) organizations move to a more competency-based management of the workforce. Defining levels of responsibility that will be used to codify positions is foundational to achieving this goal. Defining education, training, and experience required to achieve each level of responsibility will be difficult. It must include leadership, functional, and technical requirements. The Civilian Workforce Transformation Initiative has begun to define competency requirements. Success of this critical effort will be a significant step forward.

Delivery of specialized service using specialized skills

To maximize the benefits of competency management, senior Army leadership has announced plans to manage all Civilians in Career Fields in accordance with the Army Campaign Plan 2011. In the words of Under Secretary Westphal, “Our goal is to move from 40% of the force managed in a career field to 100% coverage.” All Civilians should be guided by career development roadmaps that include education, training, professional development, performance enhancing job experiences, and certification. Such a structured approach to career management could enhance the professional capabilities of Army Civilians at all levels by improving both their general knowledge and their systemic knowledge. “General knowledge” may be viewed as “having a broad understanding of the various aspects of their [respective career] field[s].” “Systemic knowledge” may be viewed as “having an understanding of how various parts of the whole interact with each other” to support the overarching Army mission. It could also provide the Army with greater visibility into the leadership capabilities and technical expertise of Army Civilian professionals so that their skills may be optimally leveraged to support a full spectrum of security requirements.

We must continue to build a strong bench of strategic Army Civilian leaders who are “broadly skilled, adaptive, and proactive” and are capable of resolving problems that require a whole-of-government approach. We need to broaden their understanding of Army decision-making processes, how various parts of the Army interact to accomplish the Army mission, and how the Army works with the other military services and Federal agencies in support of the National Security Strategy. Richard A. Lacquement, a distinguished military historian, noted that “the Army seeks to create generalists familiar with many or all of the major aspects of the profession’s expertise and the appropriate use of such expertise to complement… the specialists who master areas of knowledge that support the Army’s success in its core expertise.” These generalists are the core from which we obtain the strategic leaders of the profession.
Ability to apply specialized knowledge and render complex judgments under conditions of uncertainty

We should define the capabilities required of Army Civilians to support the accomplishment of current and likely future missions outlined in the 2010 Quadrennial Defense Review. Identify capability gaps and build cadres of Civilians with expertise in these particular areas through specialized training.

We need to capture lessons learned from Civilians who have supported the Operating Force or have worked as part of the Generating Force. The knowledge applied under unique circumstances should be shared through the Center for Army Lessons Learned (CALL). CALL is best known for its support of the Operating Force, but in fact, it supports the whole Army.

Expertise imparted through formal, theoretical, and practical education

There are many programs to train and educate the Civilian workforce, but they remain uncoordinated. The Army should conduct an inventory of the most significant Civilian leader development and functional training programs which are currently being delivered. Large, broadly targeted programs with significant costs should be rationalized. Programs should align with leadership, functional, and technical competencies required by the Army.

Accountability of members to high ethical and performance standards

All Army Civilians receive regular ethics training. This training reinforces Army values of loyalty, duty, respect, selfless service, honor, integrity, and personal courage. The message is that the “highest standards of ethics and performance are demanded from those who hold public trust.” We can go further by incorporating hypothetical ethics case studies in the workplace. A required comment on ethics in performance evaluations could reinforce high ethical standards.

Section 1113 of the NDAA FY2010 and the Federal Supervisor Training Act of 2010 direct DoD to develop and deploy supervisory training that addresses the topics mandated by statute to new supervisors and experienced supervisors. The training is intended to equip new and experienced supervisors with the requisite skills to manage employee performance effectively and to achieve the strategic priorities of the Army.

A performance-driven culture should be created by promoting an ongoing dialogue between supervisors and their employees regarding performance expectations. The now dead National Security Personnel System had the positive effect of engaging the entire workforce in a performance management dialogue. We could capitalize on that dialogue by incorporating performance accountability into the TAPES system to ensure that each Civilian achieves high standards of competence.

We could also evaluate competence in performance management as a criterion for the selection of candidates for supervisory positions, as recommended by the Merit Systems Protection Board in its May 2010 report to the President and Congress. Selections based solely on evaluation of technical competence should not be made.
Significant autonomy

Autonomy is a result of demonstrated professionalism. When society recognizes that members of a profession consistently demonstrate high standards of technical excellence and adhere to high ethical standards, it is more likely to defer to the judgment of the professionals. The more that we recruit, train, and develop our talented Army Civilians, the more responsibility and autonomy they will acquire, and the more professional our Army Civilian Corps will be.

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3 Ibid.
4 Ibid.
5 Army Field Manual 1, June 14, 2005, Section 1-40.
7 Ibid.
9 Remarks delivered by the Under Secretary of the Army, AUSA 2010 Annual Meeting and Exposition, Army Civilian Luncheon, 27 October 2010.
10 Ibid.
11 Ibid.
16 Ibid.
20 Ibid.
22 Ibid.
24 2010 Quadrennial Defense Review.
25 Ibid.
Memorandum, HQDA Deputy Chief of Staff, G-3/5/7, subject: Civilian Leader Development, 24 October 2005.


Memorandum, HQDA Deputy Chief of Staff, G-3/5/7, subject: Civilian Leader Development, 24 October 2005.


DoD 5500-7-R, Joint Ethics Regulation.

Ibid.


Ibid.


U.S. Army Command and General Staff College Title 10 Civilian Faculty Manual, CGSC Pamphlet 690-1, August 2008, Appendix A.

Ibid.

Ibid.

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Ibid, p. 28.


Remarks delivered by the Under Secretary of the Army, AUSA 2010 Annual Meeting and Exposition, Army Civilian Luncheon, 27 October 2010.


Bond, Kevin, email message to author, September 27, 2010.

Ibid.

Army Campaign Plan 2011, 7 September 2010, Q-3.


Ibid, p. 221.

Ibid, p. 221.

The capabilities required range from expertise in cybersecurity to expertise in “provid[ing] stability and good governance in ‘sovereignty-challenged’ regions.”


A Call to Action: Improving First-Line Supervision of Federal Employees, A Report to the President and the Congress of the United States by the Merit Systems Protection Board, May 2010, p.7.

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