

Comment from Jefferey S. Lubbers, Special Counsel

October 24, 2020

1. In footnote two, I suggest adding a sentence, “However, this chart only provides information as of March 2017.” It’s annoying that OPM hasn’t updated these figures. It’s really an example of what this recommendation is concerned about. I also wonder, more generally whether these kinds of citations will stand the test of time, since I suspect that at some point the chart might be removed from the OPM website, or the URL will change. Is there a way you can use a “permalink” of these kinds of citations?
2. Page 4, last line. Either add the word “the” before “policies” or remove the word “of”.
3. Line 149—Given that EO’s also can change, I suggest making this reference more general to conform to the two previous bullets: “Executive orders pertaining to ALJs”