SALARY SURVEYS AND MORE: NAVIGATING THE VA SYSTEM

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SALARY SURVEYS

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PAY DISCREPANCIES

- **Example of communication from HR:**
  - Nurses including NPs are subject to VA’s Nurse Locality Pay system where Directors are required to review market pay levels at least annually and adjust to ensure rates paid to Nurses are appropriate for recruitment and retention. Due to increasing rates in the community, the Director approved a 5% increase to Nurse Practitioner pay earlier this year.
  
  PAs are subject to VAs Special Salary Rate policy. Unlike the Nurse LPS system, adjustments beyond the annual general increase may be approved only when higher rates in the community are causing recruitment or retention difficulties. We have had no PA losses in 2016. Of the 7 PA losses in 2015, 3 were to Retirements, 2 losses to other VAs, 1 Termination and 1 Resignation. This does not show recruitment or retention issues caused by higher rates of pay in the community for PAs.
  
  - We will continue to monitor turnover and recruitment efforts and advise management when an increase is needed and justified.
What triggers salary survey

• 1. turnover rate of 40%
• 2. quit rate of over 30%
  • *Applies only* when an employee leaves to take a higher paying non-Federal position in the same occupation and commuting area
• 3. job acceptance rate of <50%
• 4. vacancy rate of over 30%
(1) Except as provided in paragraph 3a of this chapter, probational and permanent full-time nurses, PAs, and EFDAs are employed on the basis of a 40-hour basic workweek, unless on an alternate work schedule, as indicated in VA Handbook 5011, Hours of Duty and Leave. Computation of regular pay for employees on the 40-hour basic workweek shall be based on a basic hourly rate, derived by dividing the employee’s annual rate of basic pay by 2,080.
(2) General provisions for the payment of overtime pay for nurses, PAs, and EFDAs

(a) Leave without pay is not included when computing hours of work for overtime purposes.

(b) Overtime must be at least 15 minutes duration in a calendar day to be creditable for overtime purposes.

(c) Overtime is payable for service performed in excess of 40 hours in an administrative workweek, or in excess of 8 [consecutive] hours , whichever is greater, at a rate of one and one-half times the employee’s basic hourly rate of pay. **NOTE:** For a full-time employee on a compressed work schedule, overtime is pay-able for hours of work in excess of the basic work requirement. For a part-time employee on a compressed work schedule, overtime is payable for hours of work in excess of the basic work requirement for a day (but must be in excess of 8 hours) or for a week (but must be in excess of 40 hours).
CALL BACK OVERTIME

• c. Call-Back Overtime
  (1) Any overtime on a day when a nurse, PA or EFDA was not scheduled to work, or for which an employee is required to return to his or her place of employment, shall be deemed to be a minimum of 2 hours in duration, regardless of whether or not service is performed for a full 2 hours. When an employee is called back from an on-call status to perform overtime work, the callback overtime provisions shall be applied upon return to duty of the employee.
  
• (2) To be eligible for the full 2 hours of overtime, employees must be called into work at a time which is outside of and unconnected with their basic workweek (45 Comp. Gen. 53).
• d. **Compensatory Time Off in Lieu of Regular and Irregular or Occasional Overtime for Nurses, PAs, and EFDAs**

• (1) An official authorized to approve overtime work may, at the written request of eligible employees, grant such employees compensatory time off from their scheduled tour of duty in lieu of overtime pay. The amount of the compensatory time off will equal the amount of time spent in overtime work.

• Requests for compensatory time off for title 38 and hybrid title 38 employees paid premium pay on the same basis as registered nurses must be in writing.
COMP TIME

(2) Limit on Compensatory Time. The limitation on overtime pay contained in 5 U.S.C. 5547 does not apply to title 38 employees covered by this paragraph.
COMP TIME

(3) Time Limit on Compensatory Time for Nurses, PAs, and EFDAs

(a) Compensatory time should be taken as soon as possible after it is earned, but not later than the end of the 26th pay period following the pay period in which it is earned.

(b) If the compensatory time is not taken within the time limit prescribed above because of exigencies of the service, the employee will be paid for the overtime work at the overtime rate. If the compensatory time off is not taken within this period because of personal reasons not due to exigencies of service, the right to compensatory time off and overtime pay for the duty is lost.

(c) In cases of inter-station transfers, compensatory time off must be taken or paid for prior to the effective date of transfer. Under no circumstances will the obligation for compensatory time off be transferred.
EDRP

- EDRP authorizes VA to provide student loan reduction payments to employees with qualifying loans who are in health care positions providing direct patient care services and are in positions that are considered hard to recruit or retain.

- The loan must be for the health professional’s education that qualified the applicant for a specific position.

- Each Veterans Health Administration (VHA) facility determines which positions are hard to recruit and retain and when the facility will offer EDRP for these positions. EDRP is a recruitment and retention incentive only offered or approved for certain positions.
PURPOSE OF EDRP

• Provide our Veteran population with specialized care by increasing the supply of qualified health care professionals.

• Help the VHA meet its need for qualified health care professionals in occupations where recruitment or retention is difficult.
ELIGIBILITY OF EDRP

Applicants:

• Must be in a permanent full-time or part-time appointment at the time of application submission and during participation in program.

• Must be appointed in Title 38 or Hybrid Title 38 Occupation for which recruitment and retention is difficult.

• Owe any amount of principal and interest on a qualifying loan, which led to a degree that qualified the individual for the position to which appointed.

• Must maintain an acceptable level of performance in the position to which appointed and held during the EDRP service period.
COVERED EXPENSES

• Participants may receive up to $120,000 towards a qualified loan over a 5 year period.

• Qualified employees receive education debt reduction payments up to $24,000 per year, for up to five years, while they remain employed by VHA in the position that was approved for EDRP.

• EDRP qualifying loans cover tuition and other reasonable educational and living expenses, fees, books, supplies, educational equipment/materials, and laboratory expenses.

• EDRP payments are limited to the degree, which by VA Qualification Standards qualified the individual for the position and grade level to which appointed. The degree must be from an accredited school or program.
EDRP/SERVICE OBLIGATION

- Any time that a participant spends in a non-pay status during a service period must be made up with paid service before a payment can be made to or on behalf of the participant.
HOW AWARDS ARE DETERMINED

• EDRP targets health care providers in Title 38 and Hybrid Title 38 occupations, deemed hard-to-recruit or retain, who would otherwise decline or leave VHA employment.

• Each VHA facility determines which positions are hard to recruit and retain and when the facility may offer EDRP for these positions.

• National funding is prioritized based on VA and VHA workforce needs.
EISP

- Employee Incentive Scholarship Program; MCM 558-11-118.8)
Traveling to conferences
ACES no longer required

- **Non-VA Sponsored Conferences:**
  - Removal of oversight requirements for VA attendance at non-Federal external conferences

- **VA-Sponsored or Co-Sponsored Conferences:**
  - The Responsible Conference Executive (RCE), or a designated representative, must physically attend the conference and must be trained in their duties. The VA Corporate Travel Management and Reporting Office will create and distribute this training.
  - Approving officials are authorized to provide one-time approval for recurring VA sponsored or hosted conferences (e.g., annual conferences) within the overall limits of their approval authority. The VHA EES Events Division Director will assess requests for treatment of a conference as a recurring event.
  - Events with estimated costs of less than $20,000 and attended by 50 or fewer individuals will be approved at the local level. These events are not reportable but planning, approval and oversight must comply with all applicable Federal laws, regulations and policies. These events must use the standard [VHA Local Conference Approval](#) template.
ACES con’t

• **Non-Federal Sponsored External Conference**
  A non-Federal conference is an event that meets the definition of a conference* and is not sponsored by a Federal agency. An example is an event that meets licensure and certification requirements or is attended to maintain professional proficiencies sponsored by a professional organization.
  VHA employees may attend a non-Federally sponsored external conference if approved by their VHA approving official. Effective Jan. 26, VHA employees do not need to request approval through the VHA ACES system to attend a non-Federal conference.

• **Federal Non-VA Sponsored External Conference**
  A Federal non-VA conference is an event that meets the definition of a conference* and is sponsored by a Federal agency. An example is a professional training event that meets licensure and certification requirements or is attended to maintain professional proficiencies, such as those events sponsored by the National Institutes of Health, Office of Personnel Management, Department of Defense or other Federal agencies.
  VHA employees must use ACES to request and receive approval to attend a Federal non-VA sponsored conference.
  No expenditure of VA appropriated funds for attendance at a Federal non-VA sponsored conference may occur without documented ACES approval.
  If the Federal non-VA sponsored conference is not listed, it must be added to the ACES database for review and approval for VHA employee attendance.
  If you are uncertain if a conference is a non-Federally sponsored conference or a Federal non-VA sponsored conference, please contact the VHA Conference Support Team.
ACES con’t

*New Definition of a Conference:

**Conference**: A meeting, retreat, seminar, symposium or event that involves attendee travel. The term “conference” also applies to training activities that are considered to be conferences under 5 Code of Federal Relations §410.404.

**Office of General Counsel memorandum dated Oct. 26, 2016, “Conference Clarification,”** has already opined that the following events are not considered a conference:

- Veterans outreach events (e.g., sports programs)
- Traditional ceremonies (e.g., change of command, ground breaking, official military awards and funerals)
- Events at which VA is conducting recruitment activities
- Formal classroom training coursework at established government or commercial training facilities (e.g. Law Enforcement Training Center and VA Acquisition Academy)
Tuition reimbursement eligibility

- **ELIGIBILITY CRITERIA:**
  - a. Consideration for funding will be given to persons who are in good standing as indicated by a documented “Fully Successful” performance review from the last rating period.
  - b. Full-time board certified physicians and dentists are eligible to receive an annual allowance of $1000 for professional development.
  - c. Part-time staff may apply for a pro-rated portion of the current FY tuition ceiling CAP (i.e. – 1/8th - 7/8th). (see Attachment A)
  - d. Other eligibility factors include:
    - (1) Content of educational activity as it supports workforce development;
    - (2) Evolving needs of VHA and the customers we serve.
Reimbursement

• h. VHA approvals for employee participation at external training events shall document that the training is justified, cost-effective, and mission related. Activities which qualify for consideration are those which:
  • (1) Improve the employee performance of current duties;
  • (2) Maintain specialized proficiencies;
  • (3) Keep employees abreast of “the-state-of-the-art”;
  • (4) Provide employees with the skill, knowledge and attitudes necessary to implement changing policies and technology.
  • (5) Benefit to VA, Veteran care and impact of the time away from work.
REIMBURSEMENT ALLOWANCES

• Amount determined at facility level
• Ex: Dublin, GA

• Annual allowances for CME/CEUs:
• $1,000 Physician & Dentists
• $700 NP or PA
• $500 for all other clinical providers with prescriptive authority
• $200 for other non-Physicians
Physician Assistants. The employee must have demonstrated a sustained high level of performance and ability over and above that normally expected of employees in the particular grade and profession or there must have been noted contributions in some aspect of health care.
(1) Assumption of a major responsibility in administering a major patient care program.

(2) Significant accomplishments associated with an academic program conducted in affiliation with the facility where the physician assistant is employed.
Special Advancements for Achievement

**CRITERIA FOR SPECIAL ADVANCEMENT FOR ACHIEVEMENT**

**Physician Assistants.** Full-time, part-time and intermittent physician assistants may be advanced within the grade from one to five steps on the basis of professional achievement above that expected for the grade level or assignment provided they have demonstrated excellence in performance and potential for assumption of greater responsibility. Examples of such achievements include, but are not limited to:
SAA

- (1) A graduate level degree in a field related to the Department’s health care mission;

- (2) Appointment to a university faculty position;

- (3) Significant contributions to the Department’s health care mission. Such accomplishments may result from leadership or exceptional efforts on facility, regional or national task forces or committees, or by serving as a consultant on matters relating to education research, health care management, or quality of care issues;
SAA

• (4) Recognition of outstanding and exceptional achievement by a professional or academic organization;
• (5) Election to office in a professional organization at the State or national level
• (6) Independently producing or serving as a principal assistant or major contributing member on research producing publishable results that advance patient care or medical science; or
• (7) Attainment of specialty certification within the occupation. This does not include certification as a physician assistant by the National Commission on Certification of Physician’s Assistants, which is a condition of employment as a physician assistant in VHA.
AWARDS VA handbook 5017

• AWARDS. VA may recognize an employee or a group of employees through the approved use of monetary, on-the-spot, time-off, honorary or other non-monetary awards for any special contribution, act, service or achievement that benefits VA or the Federal Government in accordance with the guidelines in VA Handbook 5017
Superior Performance Award

Recognizes Sustained performance beyond normal job requirements as reflected in the employee’s most recent readings of record.

Form of Recognition

• A one-time cash award that may be granted to a title 5, title 38 or title 38 hybrid employee based on his/her performance appraisal rating of record provided that the rating of record is at the fully successful level (or equivalent) or above.
PERFORMANCE AWARDS

• VHA10-2623A

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Superior Performance Award

• Justification needed
  • A complete copy of the employees performance appraisal (or proficiency report) and a narrative description of any factors that were considered but not (described) in the appraisal, e.g., The employee’s self-assessment

• Eligibility
  • Employees covered under VA’s performance management system (or proficiency report system.)
Justification for awards

- Category I: XXXXXXXXX cared for a large primary care panel and a women's health does well with documentation of her exceptional care. She scored 100% across all her peer review. Her clinical performance measures are at or above goal.
- Category II: XXXXXXXXX has taught classes (CME level) for PACT RNs on Women's Health issues. She helped plan the Women's Health Mini-Retreat at Durham VAMC. She was a presenter for ACS Leadership book club.
- Category III: No R&D duties
Justifications con’t

• Category IV: She was very competent and efficient in her duties as RAL CBOC Clinic Lead
• (non-supervisory clinic administrative duties) as well as being selected at the DUR VAMC Lead Physicians Assistant for the whole facility working under the DVAMC COS.
• Category V: XXXXXXXXX is very personable and well liked by her colleagues, staff, and patients. She quite often received positive comments on the clinic's WOW cards (point of service comment cards from patients or staff)
• Her Press Ganey score is well above goal.
Superior Performance Award

- CASH AWARDS ARE FACILITY SPECIFIC
Special Contribution Award

A special contribution award refers to a cash award given for a special contribution made by an individual or group of individuals, for on-the-spot recognition, or for achievement of productivity/gainsharing/goal sharing program exceeding normal job expectations. Award amounts must be consistent with the Scales of Awards Based on Tangible and Intangible Benefits located in VA Handbook 5017, Part III, Appendix A.
Special Contribution Award

Examples:

• High-level performance on a special project while continuing to perform regular duties;
• Creative efforts that resulted in an important contribution to the efficiency or economy of VA operations or improved customer service such as streamlining processes or procedures or a significant reduction in paperwork;
• A major medical advancement;
• Overcoming unusual, unique, or difficult circumstances in the performance of duties with exceptional results that warrant recognition;
• Enhanced service delivery to customers through reengineering of work processes or procedures;
• Significant improvements in the quality of services and products for VA customers; and
• An act of heroism or unusual courage or competence in an emergency situation which was connected with or related to official employment.
NOTE: See checklist in VA Handbook 5017, Part III, Appendix D for additional examples of contributions that may warrant a special contribution award.

Typically, a well-written justification should take only four or five paragraphs and be limited to under one page. Following are some guidelines for formatting and content of those paragraphs:

• The first paragraph should serve as an introduction by stating the name of the employee, team, or group being recommended for the award, the award amount and summarizing (one or two sentences) the contribution being recognized. For example, "I am pleased to recommend Mary Smith for a special contribution award of $500. Ms. Smith is being recognized for ..."
The second paragraph should provide a more detailed description of the contribution including what the employee did, any significant requirements or constraints involving the contribution, and any obstacles the employee had to overcome in order to make the contribution. This information should be described in context of the impact on the organization, VA or the Nation. For example, streamlined procedures to improve nationwide quality and timeliness of veterans claims processing, new procedures to reduce or eliminate patient waiting time at the local facility.
• The third paragraph should describe how the benefits identified in the preceding paragraph were determined and, consequently, how the award was calculated. For example, using the scale of awards based on intangible benefits, identify the extent of the value of the contribution "local, regional or general" and the value of the contribution. Does the contribution being recognized represent a minor change with limited impact or an exceptional change affecting a large part of VA and its mission?

• The fourth paragraph should simply summarize the recommendation and bring it to closure.
For Special Contributions, the checklist appearing at the end of this appendix (VA Form 4659a) may be attached to VA Form 4659 and serve as the justification.
Local Value of Benefit Affects:

one or more field facilities or Central Office organizational elements or staff office, or

a minor change or correction of a VA form, policy, or procedure, or

optional use of an idea or procedure, or minor change in the area of technology or automation
**SCA AMOUNTS**

**MODERATE.** Change or contribution to an operating principle, practice, procedure or program of limited impact or use.
Award: Up to $1,000

**SUBSTANTIAL.** Significant or important change, contribution to, or modification of an operating principle, practice, procedure or program or service to the public
Award: Up to 3,000

**EXCEPTIONAL.** Complete revision or initiation of a major policy, practice or procedure that has significant impact on VA’s mission. Major improvement in the quality of a critical product, activity, program or service to the public.
Award: Up to 5,000
Regional Benefit of Value Affects:

- an entire network, region, or all Central Office organizations, or ideas approved for optional use in the Department or an administration, or important area of technology or automation.
MODERATE. Change or contribution to an operating principle, practice, procedure or program of limited impact or use.
Award: Up to $3,000

SUBSTANTIAL. Significant or important change, contribution to, or modification of an operating principle, practice, procedure or program or service to the public
Award: Up to 5,000

EXCEPTIONAL. Complete revision or initiation of a major policy, practice or procedure that has significant impact on VA’s mission. Major improvement in the quality of a critical product, activity, program or service to the public.
Award: Up to 7,500
General Value of Benefit Affects: more than one network, or region, has impact VA-wide or beyond.
**SCA**

**MODERATE.** Change or contribution to an operating principle, practice, procedure or program of limited impact or use.
Award: Up to $5,000

**SUBSTANTIAL.** Significant or important change, contribution to, or modification of an operating principle, practice, procedure or program or service to the public.
Award: Up to $7,500

**EXCEPTIONAL.** Complete revision or initiation of a major policy, practice or procedure that has significant impact on VA’s mission. Major improvement in the quality of a critical product, activity, program or service to the public.
Award: Up to $10,000
Aggregate Salary Limitation

Salary information:

January 2016 Executive Level I salary
$205,700
Recruitment Incentives

- **Relocation Incentive**: Paid as a lump sum payment at the beginning and/or end of the service and/or as installment payments during the agreed-upon service period.

- **EDRP**: VA may pay for Federally insured student loan’s as an incentive for candidates (or current employees to retract and/or retained highly qualified employees)

  - Must be stated in job description or in offer letter in order to be considered.
Retention Incentives

Retention Bonuses: Currently, rarely used. Must be approved by VACO

EDRP: VA may pay for Federally insured student loan’s as an incentive for current employees to retain highly qualified employees
Policy Guide For VA Physician Assistants
Occupational Series: 0603

**Staffing**
- Physician Assistant Qualification Standards
  - Employment Standards
  - Credentialing requirements
  - Grade Criteria
  - Professional Standards Boards
  - Promotion Eligibility
  - Time-in-grade Restrictions
  - Processing Title 38 Promotions & Advancements
  - Promotion Reconsideration and Review
  - Non-clinical Assignments/Title 5 Conversions
  - Reassignments and Staffing Adjustments

**Pay Administration**
- Initial Pay Setting
- Promotions
- Periodic Step Increases
- Additional Pay & Premium Pay
  - Overtime and Comp Time
  - On Call & Standby Pay
  - Holiday Pay
  - Tour Differential Pay
  - Weekend Premium Pay
- Recruitment, Retention, & Relocation Incentives
  - Recruitment & Relocation Incentives
  - Retention Incentives
  - Aggregate Limitations on Pay
- Special Pay Rates
- Aggregate Limitations on Compensation
- Dual Compensation
- Compensation Time Of For Travel
- Pay Schedules
Policy Guide For VA Physician Assistants
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- **Hours of Duty and Leave**
  - Workweek and Tour of Duty
  - Flexible and Compressed Tours of Duty
  - Leave

- **Annual Leave**
- **Sick Leave**
- **Leave Accrual Rates**
- **Maximum Leave Accumulation**
- **Military Leave**
- **Authorized Absence**
  - Conferences and CME
  - Teaching
  - Examinations (Certification)
- **Leave Without Pay**

- **Employee Recognition and Awards**

  - **Special Contribution Awards**
    - Title 38 PA Eligibility
  - **Amounts of Cash Awards**
  - **Superior Performance Awards**
    - Title 38 PA Eligibility

- **2. Policy**
  - Appendix B, 1.,b
  - Part I, Appendix B, 3
  - Time Off Awards
  - Appendix F.
  - Special Advancement for Achievement
  - Special Advancement for Performance

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**VA Handbook 5011**
- Part II, Chapter 3
- Part II, Chapter 5 Par 5
- Part III,

**VA Handbook 5017**
- Part III, Par 1
- Part I, Appendix B, 2.
- Part III, Appendix A.
- Part III, Par. 2.

**VA Directive 5017, 2.**
- Part I, Appendix B,
- Part I, Appendix B, Part III,
Policy Guide For VA Physician Assistants
Occupational Series: 0603

- **Employee-Management Relations**
  - Disciplinary Procedures
  - Probationary Review
  - Grievances & Administrative Appeals
  - Disciplinary Appeals Board

- **Utilization of Physician Assistants**
  - Scope of Practice
  - Medical Supervision
  - Prescribing
    - Non-Controlled Substances
    - Controlled Substances
    - Certification Requirement
    - b., (2), d.

- **Credentialing and Privileging**

- **Informed Consent for Clinical Treatments & Procedures**

- **The Joint Commission Standards**

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**VA Handbook 5021**
- Part II
- Part III
- Part IV
- Part V

**VHA Directive 2004-029**
- Attachment A
- Attachment A, Par 5.
- Attachment A, Par 7.
- Attachment A, Par 7, a.
- Attachment A, Par 7, b.
- Attachment A, Par 7,

**VHA Handbook 1100.19**

**VHA Handbook 1004.01**

**2011 Joint Commission Hospital Standards**
Cost of Living

• A cost-of-living raise is an increase in pay that's intended to keep the buying power of an employee's salary the same during a period of inflation.
• A cost of living raise is intended to keep your pay the same in relation to rising prices.
• One thing to keep in mind is that cost-of-living raises aren't really raises. They're simply intended to keep your pay the same in relation to rising prices.
• Special salary rates do increase but it is a percentage and it varies,
• Cost of living increases are from Congressional Action.
Locality Pay

• Another type of cost-of-living raise, often called "locality pay," takes into account not inflation but local prices.
• Locality pay is offered so federal workers don't look elsewhere for higher-paying jobs in their assigned geographical areas.
• Federal locality pay adjustments provide a means for workers to earn salary additives on top of their base pay, predicated on where they're assigned to work.
Pay Raises

• Pay raises are typically 1-3%, although pay rates may be frozen during difficult economic times. Raises must be approved by congress in their yearly budget. If congress does not pass a budget, the president may introduce a raise with an executive order.
Special Salary Rates

- The Office of Personnel Management (OPM) may establish higher rates of basic pay - special rates - for a group or category of General Schedule (GS) positions in one or more geographic areas to address existing or likely significant handicaps in recruiting or retaining well-qualified employees. OPM may establish special rates for nearly any category of employee - i.e., by series, specialty, grade-level, and/or geographic area.
Special Salary Rates

- OPM may establish special rates to address staffing problems caused by -
  - significantly higher non-Federal pay rates than those payable by the Federal Government within the area, location, or occupational group involved;
  - the remoteness of the area or location involved;
  - the undesirability of the working conditions or nature of the work involved; or
  - any other circumstances OPM considers appropriate.

- Employees who are covered by a special rate schedule are entitled to the applicable special rate within that schedule unless they are entitled to a higher rate of basic pay under other authority (e.g., a higher locality rate or a retained rate).
Special Salary Rates

- In some cases, special rate schedules cover multiple locations where different locality rates apply. In some locations, the locality rate may be higher, while in other locations the special rate is higher. We show a special rate in a schedule if it is higher in at least one location covered by the special rate schedule; however, that special rate is not applicable to an employee if he or she is stationed in a location where a higher locality rate applies. Generally, you will find a special footnote below the special rate schedule that explains that (1) a higher locality rate may apply at certain grades or steps in certain locations or (2) the special rates for a specific grade apply only to certain locations where the locality rate is lower.
Special Salary Rates

- For some special rate schedules, special rates may apply only at certain steps of a grade, since any applicable locality rate exceeds the special rate at other steps. This occurs in the case of special rate schedules for which the special rate supplement is a fixed dollar amount. Since a locality payment is a fixed percentage, a special rate computed using a fixed-dollar supplement may be higher than the locality rate at lower steps but lower than the locality rate at higher steps. When no special rate appears at a particular step in a schedule, that means the locality rate for that step in all covered locations is higher than the special rate.