



IN REPLY REFER TO

United States Department of the Interior

U. S. GEOLOGICAL SURVEY
Western Fisheries Research Center
6505 NE 65th St.
Seattle, WA 98115

January 29, 2020

TO: Eveline J. Emmenegger, Research Microbiologist

FROM: Maureen K. Purcell, Supervisory Microbiologist

SUBJECT: Notice of Proposed – Separation

1/29/2020

X *Maureen K. Purcell*
Maureen Purcell
Supervisory Research Microbiologist - Fish ...
Signed by: Geological Survey

This is notice that I am proposing your non-disciplinary separation, in accordance with 5 U.S.C., Chapter 43, Part III, Chapter C; 5 C.F.R. Part 432, Subpart D; the U.S. Department of the Interior Manual at 370 D.M. 430; and the U.S. Department of the Interior's Performance Appraisal Handbook, from your position of Research Microbiologist, GS-0403-12, with the USGS Western Fisheries Research Center, and from the Federal service, no earlier than 30 days from the date you receive this notice. This proposal is based on your unacceptable performance in Critical Element 4 of your Employee Performance Appraisal Plan (EPAP).

Background History

On December 7, 2018, you were issued your FY19 EPAP which established the performance expectations for the rating period ending on September 30, 2019. On October 16, 2019, you were advised that your performance was determined to be at the unacceptable level in Critical Element 4 of your FY19 EPAP. As a result, you were issued a Notice of Opportunity to Demonstrate Acceptable Performance (NODAP) which afforded you an opportunity to demonstrate you could perform at a fully successful level in this critical element. The NODAP began on October 16, 2019 and ended on November 20, 2019. The NODAP explained what you needed to accomplish during the opportunity period in order to raise your performance to at least the fully successful level. As outlined below, I have determined that you failed to meet the fully successful expectations contained in the NODAP and therefore, your performance is determined to be unacceptable.

Determination of Unsatisfactory Performance

Critical Element 4 relates to Science Communicated. This critical element

requires employees in your position to prepare and submit for publication manuscripts and reports of high quality for dissemination to partners, customers, peer scientists, and other users. Performance is measured, for those factors that are in the employee's control, by the quality and the scientific impact of the research findings; by the number of reports, articles, etc., produced; the accuracy and clarity of the research projects; the extent of revisions required by supervisory, peer, and Bureau reviews; and meeting deadlines”

The Fully Successful Benchmark standard states: The employee demonstrates good, sound performance that meets organizational goals. All critical activities are generally completed in a timely manner and supervisor is kept informed of work issues, alterations, and status. The employee effectively applies technical skills and organizational knowledge to get the job done. The employee successfully carries out regular duties while also handling any difficult special assignments. The employee plans and performance work according to organizational priorities and schedules. The employee communicates clearly and effectively.

The specific performance standards for Critical Element 4 stated, in part, that the “Employee routinely makes one or more significant research contributions. Significance is evaluated by the scientific impact, fundamental importance, scope and applicability of the research and is typically demonstrated by lead or senior authorship of journal articles or peer-reviewed USGS reports” and “Journal articles, reports, posters, web sites, data releases, software, outreach materials and other products are routinely of high quality and are completed in a timely manner and according to USGS Fundamental Science Practices (FSP), DOI, Section, and Center policies and procedures.”

To achieve an acceptable level of performance, the NODAP specifically required you to:

1. Complete the SVCV strain virulence study on two koi stock varieties
2. Identify an established peer-review journal for manuscript publication and obtain supervisory approval
3. Write a high quality and complete manuscript that is correctly formatted for the targeted journal.
4. Format the data and metadata release in Science Base.
5. Submit the completed draft manuscript by the established deadline for review by the supervisor, expert peer-reviewer, and Bureau Approving Official.

The NODAP explained that the quality of the manuscript would be evaluated based on the extent of revisions necessary by supervisory, peer, and Bureau reviews and meeting the deadline.

In evaluating whether you successfully completed the opportunity period, I relied

on my own review and evaluation of your draft manuscript; I requested a review from a neutral, external subject matter expert; I reviewed the feedback on your draft manuscript that you received from internal colleagues and co-authors; and I reviewed four draft manuscripts authored by other USGS GS-12 level scientists to compare variation in manuscript quality among Ecosystem Mission Area scientists of equivalent grade. I also used the USGS Peer Review Checklist from the USGS Survey Manual Chapter 502.3, Fundamental Science Practices – Peer Review when conducting my review of your draft manuscript, as well as for the four draft manuscripts written by other GS-12 scientists. Finally, I used as a reference the book on scientific writing, Day & Gastel (2016) 8th Edition, How to Write and Publish a Scientific Paper, that was recommended in the instructions to authors for the ‘Diseases of Aquatic Organisms’ journal you selected for publication of your manuscript.

For the following reasons, I have determined that you have failed to bring your performance to an acceptable level of performance during the opportunity period that you were provided. While you met the timeframe to submit the draft manuscript and the selected journal was approved by me, the product that you submitted did not meet the quality and completeness expectations outlined in the NODAP and the established performance standards for Critical Element 4.

1. The results and conclusions in your manuscript were based on eight datasets that were submitted for evaluation as part of the data release. Datafiles #1 and #2 had mortality data for each fish type. Datafiles #3 - #8 reported virus levels in mortalities, sampled fish, and survivors. In your manuscript, mortality datasets (#1 and #2) were subjected to multiple statistical tests, including one-factor analysis of variance (1-way ANOVA), 2-way ANOVA (simple effect), Kaplan-Meier analysis, and Mantel-Cox log rank test. While all of these tests may not have been necessary, all the tests appeared to be applied correctly indicating that you had the resources and knowledge to perform these statistical analyses.

Your manuscript does not report any statistical testing of datasets #3, #4, #5, #6, #7, and #8 to evaluate study hypotheses. These 6 datasets were summarized into figures and the results section reports trends based on your visual inspection of the figures and raw data. No statistical testing was performed to establish the significance of the trends. During my review, I was able to perform statistical analysis (2-way ANOVA) for datasets #5, #6, #7, and #8 and the results indicate that your conclusions must be revised. I was not able to perform an analysis of datasets #3 and #4 because you did not record or report an important factor to consider (time of death) in the datafiles.

Based on the considerable time spent during our weekly feedback meetings during the opportunity period on statistical methods, I believe you were clearly aware of the expectations for complete statistical analysis of the study data. Furthermore, it

is established practice to perform statistical analysis of study data to test scientific hypotheses prior to drawing conclusions. Visual inspection of trends is rarely an acceptable approach to base conclusions.

My review of the four comparable draft manuscripts by other GS-12 USGS scientists found that all four draft manuscripts based their conclusions on complete analysis of the study data with appropriate statistical or quantitative modeling methods.

I believe you had ample resources and knowledge to conduct the expected statistical analyses and had ample opportunity during our weekly meetings, or at other times, to consult with me or raise any concerns regarding analyses for these datasets. Failure to apply statistical testing to 6 of the 8 datasets equates to 75% of the study data having no or incomplete analysis. Furthermore, drawing conclusions without formal hypothesis testing is not considered quality science. Therefore, I do not find that your draft manuscript met the performance expectations of a complete and high-quality product.

2. Your draft manuscript contained significant quality issues. Specifically, the external reviewer noted that your figures were complex and difficult to interpret, and that the discussion section was quite long, repetitive and delved into topics not addressed by the work performed. My review also noted that the excessive level of detail and repetitiveness in the discussion section made it difficult to grasp the main points. My review also found statements or conclusions that were not accurate.

In my evaluation, I found that your results section was much longer (1.8 times longer) than the other four comparable draft manuscripts that I reviewed which were authored by other GS-12 scientists. The comparable manuscripts all contained clear and concise results sections that lacked redundant or repetitive information. As explained by Day & Gastel (2016) in the 8th Edition of *How to Write and Publish a Scientific Paper*, clarity is critical because the results section reports the new knowledge gained from a study. Day & Gastel (2016) state that high-quality scientific manuscripts present the results “clearly and simply” with the goal to achieve “crystal clarity.” I had discussed with you during our weekly feedback meetings that the figures and data in the main body of the text appeared repetitive and redundant and suggested that you either remove the redundant figures/tables or make the redundant figures/tables supplemental files. You chose not to do either and retained the redundant information in the body of the manuscript.

Based on my review of the manuscript and data release files, major and extensive corrections and revisions would be needed to meet the expectations of accuracy and clarity prior to receiving supervisory approval for journal submission. It was

also the opinion of the external subject matter expert that, if this was authored by one of his employees, he would not approve the submission to a journal in its current state. Therefore, I find that your draft manuscript failed to meet the fully successful performance expectations for a high-quality product.

3. The four comparable draft manuscripts produced by other GS-12 scientists clearly articulated the scientific need and/or importance of their work and reported experimental designs that were appropriate to address clearly defined study goals. In my review of your manuscript, I found that you did not clearly articulate the scientific need for the research. Your stated goal in the manuscript was to compare inter ("between")-genotype and intra ("within")-genotype relative virulence of spring viremia of carp virus (SVCV) in two koi lines. However, the external reviewer noted that the unbalanced experimental design (5 strains of one genotype and a single representative of the other three genotypes) means there are not enough data to draw conclusions regarding "between" genotype virulence differences. While your experimental design did allow a sound evaluation of "within" genotype virulence differences, the external review indicates this finding is less novel for the field and the use of two koi lines from the same breeding program also limited the applicability of the results to a broader koi breeding industry. Thus, the external subject matter expert concluded that limitations of your experimental design did not allow the manuscript to meet the performance expectations of fundamental importance, applicability, and scientific impact. Therefore, I find that your draft manuscript failed to meet the fully successful performance standard to represent a significant scientific impact or contribution.

The NODAP was designed to give you an opportunity to demonstrate your ability to perform at an acceptable level. You were given every opportunity to improve but failed to do so. I provided you guidance and feedback to you and met with you on a weekly basis, normally on Fridays unless precluded by leave or travel schedules. Despite your efforts, your performance remains unacceptable. Therefore, based on the unacceptable performance described above, I am proposing your removal from your current position as a Research Microbiologist, GS-0403-12, and the Federal service.

Although an employee who fails a NODAP may be reassigned or demoted to another position in lieu of termination, I do not have any vacant funded positions in my section to reassign or demote you to.

You may respond to the specifics of this proposed removal orally, in writing, or both orally and in writing. You may also submit affidavits or other documentary evidence in support of your reply. Your response should be addressed to Marijke van Heeswijk, Acting Regional Director, Northwest-Pacific Islands Region, who is the deciding official on this action. Following is her address:

Marijke van Heeswijk, Acting Regional Director
909 First Ave.
Seattle, WA 98104
206-948-5792
heeswijk@usgs.gov

You have the right to be represented by an attorney or any other representative of your own choosing in preparing and making your reply. You must provide a written designation of any representative to the deciding official in order for that person to act and receive information from the agency on your behalf. You and your representative (if a Department of the Interior employee in an active duty status) may have a reasonable amount of official time (up to 8 hours) to review the material on which this proposal is based and to prepare and present your reply. If you are in a duty status for the period you request official time, you must arrange with me in advance for the use of this time. The material relied upon to support the reasons for this proposal will be provided to you upon request.

Any reply you or your representative wishes to make must be received by Ms. Van Heewijk no later than 7 calendar days from the date of your receipt of this letter. If you wish to make an oral response, you should call her at (206) 948-5792 to schedule that presentation. If you need an extension of time to make your reply, you should submit your request to her, and she will make a decision on your request. Please ensure that you provide documentation and evidence to support any claims you may present in either your oral or written reply. Full and careful consideration will be given to any facts and circumstances which you or your representative present.

I want to remind you of the Department's Employee Assistance Program (EAP) with EAP Consultants. This program provides a comprehensive assistance and counseling service by professionals to help employees solve problems in a guaranteed voluntary and confidential setting. For further information relative to the EAP counseling process, you may contact EAP Consultants at (800) 869-0276.

If you have questions regarding the procedures used to propose this separation, and/or you wish to obtain a copy of the materials relied upon in this proposal, you may contact Shari Walters, Employee Relations Specialist, by email at swalters@usgs.gov or by phone at (303) 236-9571.

You will receive a written notice of the decision and the reasons for that decision within 30 days after expiration of the advance notice period. Final action, if any, will not be taken earlier than 30 calendar days from the date of your receipt of this notice.

During the advance notice period, and until a decision is issued, you will be placed on a non-duty, paid status (administrative notice leave code 064). You will need to turn in your government identification (PIV card) and any government keys and/or equipment (laptop, phone, credit card, etc.) that you may have. While on administrative leave, you may not enter any USGS/DOI facility and your access to official files, government computers, and USGS/DOI networks will be revoked effective immediately. If you need to enter a USGS/DOI facility while on administrative leave, to access information necessary to formulate your response or for other specified reasons, you must contact me to make arrangements. While on administrative leave, you must remain in a work-ready status and be prepared to report for duty, on very short notice, during your regularly scheduled hours of work. If you are unavailable to work, you must request and receive approval for annual leave, sick leave, or other appropriate leave status through the normal leave requesting procedures. Finally, you will not perform any official work while on administrative leave and you will not contact other USGS employees, either telephonically or electronically, in any official capacity. You are expected to adhere to all governing directives regarding the conduct of Federal employees and employees of DOI, including your conduct while you are off-duty. Failure to adhere to these instructions could result in disciplinary action.

If you have questions regarding benefits or questions related to the procedures used to propose this action, you may contact Shari Walters, Employee Relations Specialist, swalters@usgs.gov or 303-236-9571.

Receipt Acknowledgement

You are requested to sign and date the acknowledgement copy of this memorandum as evidence that you have received it. Your signature does not mean that you agree or disagree with the contents of this memorandum and by signing you will not forfeit any of the rights mentioned. However, your failure to sign will not void the contents of this memorandum.

Receipt Acknowledged: _____

Date: _____