



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

November 4, 2025

Memorandum

To: DOI Human Capital Officers
Director, Office of Law Enforcement and Security

From: Jennifer A. Ackerman
Director, Office of Human Capital
Deputy Chief of Human Capital Officer

SUBJECT: Amendment to Personnel Bulletin 25-05 and Dual Compensation Waivers for Law Enforcement Positions

In August 2025, the use of dual compensation waivers for reemployed annuitants in law enforcement positions was authorized at the Department of the Interior (Interior) via issuance of Personnel Bulletin (PB) 25-05. This authorization was approved and delegated to Interior by the U.S. Office of Personnel Management (OPM) via memorandum and delegation agreement, signed December 23, 2024.

Following further discussion regarding application of dual compensation waivers and continued coordination with OPM, PB 25-05 is hereby amended to allow for the use of dual compensation waivers for reemployed annuitants in law enforcement positions with a mandatory retirement age when the mandatory retirement age is waived from age 57 to up to age 60, in accordance with PB 12-16 *Maximum Entry Age Requirements and Mandatory Retirement for Law Enforcement Officers and Firefighters*.

Section 4 – Policy of PB 25-05 is hereby amended to read as follows (all strikethrough text is rescinded in the amended PB):

4. Policy. The authority to waive the dual compensation reduction (salary off-set) required of reemployed annuitants by sections 8344 and 8468 of title 5, United States Code in connection with protecting public lands is delegated by OPM to the Department of the Interior. This delegation enables the Office of Human Capital (OHC) by delegation of the Department's Chief Human Capital Officer (CHCO) and Deputy Assistant Secretary, Human Capital, Learning and Safety (DAS-HCLS) to waive the salary off-set when necessary to reemploy a Civil Service Retirement System (CSRS) or Federal Employees Retirement System annuitant (FERS) on a temporary basis, but only if, and for so long as, the authority is necessary to immediately and quickly reemploy retired Federal employees needed to ensure safety to visitors and inhabitants of public lands, and protect public lands under Interior's jurisdiction from vandalism and other

criminal activity. This delegation is valid from the effective date of this Personnel Bulletin through December 31, 2028, and is subject to the following limitations and requirements:

- The Department's CHCO or DAS-HCLS may waive the salary off-set on a case-by-case basis, when necessary to immediately and quickly hire, on time-limited appointment, an annuitant with optional retirement, excluding annuitants with early voluntary and buyout retirements, for the occupations and positions listed in Section 2 of this Personnel Bulletin. This authority extends to both temporary and term appointments.
- The Department's CHCO or DAS-HCLS may terminate the waiver when the conditions that make the waiver necessary change, when the annuitant leaves the position, when the position or nature of the work changes, when the annuitant reaches the mandatory separation age pursuant to 5 U.S.C. 8335(b)(1), or when the not-to-exceed date is reached.
 - Reemployed Annuitants covered by this Personnel Bulletin can only be employed until the last day of the month they turn 57 years old, if they are in a primary covered mandatory retirement position, unless the mandatory retirement age has been waived up to age 60 in accordance with the procedures outlined in PB 12-16. If the mandatory retirement age has been waived to age 60, reemployed annuitants may be employed with salary off-set waiver up to age 60, in accordance with all other applicable provisions contained within this PB.
 - If a Reemployed Annuitant has a dual compensation waiver prior to age 57, a mandatory retirement age waiver must be requested and approved, in accordance with PB 12-16, prior to re-authorization of the dual compensation waiver.
 - ~~The Department will not approve an "until age 60" waiver for individuals in primary covered mandatory retirement position requesting a dual compensation waiver.~~
 - Reemployed Annuitants being placed in a secondary covered position will not have a mandatory retirement age restriction.

Please refer all questions on this guidance to the Office of Human Capital policy division at DOI_Office_of_Human_Resources@ios.doi.gov.

Attachments:

PB 12-16 Maximum Entry Age Requirements and Mandatory Retirement for Law Enforcement Officers and Firefighters

PB 25-05 Dual Compensation Waiver for Reemployed Annuitants in Law Enforcement Officer and Related Identified Positions