



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

The Director

April 11, 2024

Memorandum for Heads of Executive Departments and Agencies

From: Kiran A. Ahuja
Director

Subject: Issuance of Pathways Final Rule

Today, the U.S. Office of Personnel Management (OPM) is pleased to announce the issuance of OPM's final regulations on the Pathways Programs for Interns, Recent Graduates, and Presidential Management Fellows, which is one of the most significant actions to expand opportunities for early career talent in the federal government since the inception of Pathways 14 years ago. These final regulations update and modernize the Pathways Programs, enabling federal agencies to more easily hire early career talent.

The Biden-Harris Administration is committed to recruiting a workforce from all segments of society. Recruiting and hiring the next generation of federal leaders is a critical priority in the [President's Management Agenda](#). Historically, people early in their careers have faced challenges in competing for federal jobs. To provide a clearer federal service on-ramp for early career talent, the Obama-Biden Administration created the Pathways Programs in 2010 through Executive Order 13562. The Pathways Programs consist of programs for Interns, Recent Graduates, and Presidential Management Fellows, and are intended to facilitate recruitment and hiring of early career talent across government.

The new regulations, issued today, are effective on June 11, 2024, and the final rule is accessible on the [Federal Register website](#). Agencies may begin using the new provisions of this rule at that time, provided they have updated their policies and procedures to reflect the changes in the final rule. Some agencies may require more time to implement the changes and have until December 9, 2024, to be in full compliance with the final rule. This means some agencies may begin using the new provisions sooner than others.

Key Changes Include:

- Eligibility for the Pathways Internship and Recent Graduates Programs is expanding to include those with or without formal degrees who have completed "qualifying career or technical education programs" (which may

include Registered Apprenticeship Programs, Job Corps, Climate Corps, AmeriCorps, and Peace Corps).

- Interns who have completed Registered Apprenticeship Programs and Job Corps can now count time served in those programs toward the total hours required to be eligible to convert to a permanent federal position.
- Agencies may now convert interns to a permanent federal position once they complete a minimum of 480 internship hours (down from 640 hours). Agencies also now have more options for granting waivers to outstanding interns, which may allow them to be converted after just 320 hours.
- Agencies may hire recent graduates at a GS-11 starting salary. The previous limit was GS-09. For comparison, the 2024 base rate difference between a GS-11 Step 1 (\$62,107) and a GS-09 Step 1 (\$51,332) is \$10,775 (See [GS pay scale](#)).
- Agencies now have 180 days to convert interns into permanent positions (up from 120 days), which will help both applicants and agencies. Additional administrative changes will make it easier for agencies to recruit and hire for Pathways positions and for individuals to navigate the federal hiring process.

These final regulations build on a series of actions OPM has taken to help federal agencies recruit early career talent:

- Issuing [guidance](#) on promoting internships, fellowships, and apprenticeships;
- Issuing interim regulations providing for direct hire authority for certain [post-secondary students](#) and [recent graduates](#);
- Directing agencies to use [skills-based assessments](#) to evaluate talent rather than proxies for skills, such as degree requirements or occupational self-assessments;
- Launching an [Intern Portal](#) on USAJOBS for agencies to post internships centrally, making it easier for applicants to find and apply for internships;
- Creating a centralized Intern Experience Program with resources for [current](#) and [prospective](#) interns as well as programming that reached more than 2,100 federal interns in its first year, with a second summer series for interns government-wide planned in June 2024;
- Developing [resources](#) and training sessions for hiring managers and supervisors to enhance interns' experiences;

- Developing an Intern Talent Program (“database” of interns eligible for conversion) that connects federal managers with interns looking for continued service opportunities at the end of their Pathways Internship;
- Increasing the number of Presidential Management Fellows Program Finalists selected, making more ready-to-hire early career talent available to agencies than ever before; and
- Launching the Talent Sourcing for America “Level Up to Public Service” pilot program to improve and formalize outreach and recruitment at Minority Serving Institutions.

Pathways Implementation

Over the coming weeks and months, OPM will provide the following tools and resources to help agencies fully implement the changes in the Pathways regulations, including:

- Updated web-based guidance, including updates to the Pathways Programs Handbook and the Pathways Toolkit for Managers and Supervisors;
- Briefings for the CHCOs and Deputy CHCOs;
- Webinars for other HR leaders, hiring managers, job seekers, university career leaders, and other talent sources and interested stakeholders; and
- Monthly meetings with Pathways Program Officers and Presidential Management Fellows Program Coordinators.

While OPM will provide tools and resources to help you implement the new changes, we ask you to review your current policies and procedures and make updates to reflect the changes in the final rule. In addition, agencies should communicate these changes to hiring managers, program participants, potential applicants, and other stakeholders.

Questions

Agency headquarters-level human resources offices may contact OPM at pathways@opm.gov. Component-level human resources offices must contact their agency headquarters for assistance. Employees must contact their agency human resources office for assistance.

Attachments:

- Fact Sheet: Summary of changes to the Pathways Programs (see PDF below)
- [Pathways Programs Overview](#)
- [Pathways Programs Comparison Chart](#)
- [Pathways Programs Answers to Frequently Asked Questions](#)

Cc: Chief Human Capital Officers (CHCOs), Deputy CHCOs, Human Resources Directors



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Fact Sheet: Pathways Programs Final Rule

The U.S. Office of Personnel Management (OPM) is updating the Pathways regulations to better enable the federal government to compete with other sectors for early career talent.

OPM recently released the final rule, which updates the requirements and procedures for agencies that hire early career talent through Pathways. This document summarizes changes found in the final rule and should be read in conjunction with the revised regulations.

Significant Changes

The updated regulation provides significant new flexibilities for agencies to use Pathways as a cornerstone of their early career talent strategies.

- Expands Pathways Internship and Recent Graduates Programs eligibility to include those who may or may not have formal degrees, but who have completed “qualifying career or technical education programs” (which may include Registered Apprenticeship Programs, Job Corps, Climate Corps, AmeriCorps, and Peace Corps).
- Provides additional flexibility for meeting the public notice requirement.
- Requires agencies to provide information on workforce planning strategies and their use of the Pathways Programs on a fiscal year basis, every 3 years instead of annually.

Internship Program

- Allows interns who have completed Registered Apprenticeship and Job Corps Programs to count time served in those programs toward the total hours required to be eligible to convert to a permanent federal position.
- Allows agencies to convert interns to term or permanent federal positions once they complete a minimum of 480 hours (down from 640 hours). An agency may continue to waive up to one-half of the minimum service requirement provided the intern has completed at least 320 hours of career-related work experience under an Internship Program appointment with exceptional job performance, demonstrating high potential in an academic or career and technical education program.
- Interns now have more options for meeting the requirements for these waivers. They can provide a letter of recommendation from a program instructor or administrator attesting to their outstanding program performance or qualify under

the current academic requirements of attaining an overall grade point average of 3.5 or better or standing in the top 10 percent of their graduating class or induction into a nationally recognized scholastic honor society.

- Agencies now have 180 days (up from 120 days) to convert interns into permanent positions, which will help both applicants and agencies.

Recent Graduates Program

- Allows alums of Registered Apprenticeship Programs, Job Corps, Peace Corps, and certain AmeriCorps Programs to apply for recent graduate positions.
- Allows an agency to make an initial appointment up to the GS-11 level (or equivalent under another pay and classification system, such as the Federal Wage System). The previous limit was GS-09.
- Allows recent graduates to be converted to term or permanent positions in different agencies, under certain circumstances.

Presidential Management Fellows (PMF) Program

- Lengthens the time allowable for PMFs to create and have a training plan approved to within 90 days of appointment (up from 45 days).
- Allows PMFs to work a part-time schedule, at the discretion of their employing agencies, for a limited period of up to 6 months.
- Clarifies the types of activities permissible for PMFs' developmental and rotational assignments.
- Allows PMFs to be converted to term or permanent positions in different agencies, under certain circumstances.
- Clarifies the role of the agency PMF Program Coordinator by outlining the specific responsibilities of the role.