

Periodically Listing Updates to Management (PLUM) Reporting

Agency Guidance and Instructions



This guide was prepared in accordance with the law (5 U.S. C. 7901), and contains information on best practices and recommendations for designing, implementing, and executing Agency Guidance and Instructions.

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Introduction

This Guide provides agency officials with a detailed description of the reporting responsibilities, rules, legislation, and policies that govern the reporting of information on policy and supporting positions at an agency, as defined herein and under 5 U.S.C. 3330f. [Definitions](#) are provided in Appendix A of this guidance.

Overview

The Periodically Listing Updates to Management (PLUM) Act of 2022 (codified at [5 U.S.C. 3330f](#)) requires the U.S. Office of Personnel Management (OPM) to establish, host, and maintain a public-facing website containing information on policy and supporting positions as defined at [5 U.S.C. 3330f\(a\)\(5\)](#) for the sitting administration and each subsequent administration.

This law focuses on improving government transparency, accessibility, and accountability, and providing the public with more comprehensive reporting about policy and supporting positions. The website created under the PLUM Act will provide more up-to-date information on the leadership and organization of federal agencies, including an administration's top leaders and placement of political appointees, along with many positions filled by senior career officials in the federal civil service.

The U.S. Office of Personnel Management (OPM) has the primary responsibility for maintaining this website and for publishing this data on policy and supporting positions.

Background

The requirement under [5 U.S.C. 3330f](#) will replace the quadrennial Plum Book historically assembled by OPM in coordination with the U.S. Government Publishing Office and published on behalf of the Senate Committee on Homeland Security and Governmental Affairs and the House Committee on Oversight and Accountability alternately after each Presidential election. In recent years, an online version of the Plum Book has been made available to the public. The PLUM Act generally codifies the reporting categories in the Plum Book and requires certain additional data to be reported.

Applicability

These instructions and guidance apply to all components within the Executive Office of the President and to all executive [agencies](#), to include Independent Regulatory

Agencies, Government Corporations, Boards, Commissions, Inspectors General and the Council of the Inspectors General on Integrity and Efficiency. These instructions and guidance also apply to the Architect of the Capitol, the Government Accountability Office, the Government Publishing Office, and the Library of Congress. For purposes of the PLUM Act, and this document, the aforementioned entities are all referred to as “agencies.”

Reporting Requirement

Each agency, as defined in the PLUM Act, must provide OPM with the required data on each policy and supporting position at the agency. The major categories of positions that all agencies must report include:

- All positions appointed by the President, by and with the advice and consent of the Senate.
 - For example, this may include, but is not limited to:
 - the heads of most major agencies (i.e., cabinet secretaries)
 - leadership at the Deputy Secretary, Under Secretary, and Assistant Secretary levels
 - the heads of most independent agencies
 - ambassadors and U.S. Attorneys
- All other positions appointed by the President, except for positions appointed under 3 U.S.C. §§ 105(a), 105(b), 106 or 107(b) that have no role relating to government policy and do not have a confidential working relationship with an official who has a role relating to government policy.
- All positions of a confidential or policy-determining character under [5 CFR 213.3301](#) (schedule C of subpart C).
- All other politically appointed positions classified at or above level GS-14 of the General Schedule (or equivalent), unless such a position has no role relating to government policy and does not have a confidential working relationship with an official who has a role relating to government policy.
- All positions designated as “general” in the [Senior Executive Service](#) (SES).
- All positions in the [Senior Foreign Service](#).

OPM notes that it may expand the list of policy and supporting positions to include additional positions that are not already covered by the bullets and are of a similar type.

Listed below are the types of appointment to be reported under [5 U.S.C. 3330f](#).

- **Career Appointment (CA)** – appointment through competitive merit staffing procedures made without time limitations and providing certain job protections and benefits.
- **Limited Term Appointment (TA)** – nonrenewable appointment made for up to 3 years to an SES General position, which expires because of the nature of the work (e.g., a special project, or to facilitate transition between administrations).
- **Limited Emergency Appointment (EA)** – nonrenewable appointment made for up to 18 months to an SES General position, established to meet a bona-fide, unanticipated, urgent need.
- **Noncareer Appointment (NA)** – usually political appointments and made without a specific time limitation, though the appointee serves at the pleasure of the appointing authority. Noncareer SES appointments are usually made within each agency and approved by the Office of Personnel Management (in coordination with the White House Presidential Personnel Office).
- **Presidential Appointment with Senate Confirmation (PAS)** – top-level, senior positions that include the heads of most major agencies. These appointments require confirmation by the U.S. Senate.
- **Presidential Appointment (without Senate Confirmation) (PA)** – positions appointed by the President that do not require confirmation by the U.S. Senate.
- **Schedule C Excepted Appointment (SC)** – political appointments in policymaking positions or positions which serve in confidential or policy roles immediately subordinate to other Presidential and noncareer SES appointees. Schedule C appointments are approved by the Office of Personnel Management (in coordination with the White House Presidential Personnel Office).
- **Appointment Excepted by Statute (XS)** – appointments authorized by the parent agency’s governing legislation.

Data Collection

OPM’s Executive and Schedule C System (ESCS) is the secure web-based application used to collect and maintain agency information on all Presidential appointees (both with (PAS) and without Senate confirmation (PA), career and noncareer senior executive service (SES) members, noncareer non-executive employees on Schedule C (Sch C) appointments, and other executive personnel systems.

Human Resources personnel at agencies are required to establish accounts for ESCS to enter, view, and maintain their respective agency data and complete input and updates on a regular basis, including when instructed to do so by OPM. For access to ESCS, email ESCS@opm.gov.

Data Standards

All data should be current, complete, accurate and reliable. Data elements reported on the website for each policy and supporting position will include:

- Agency (e.g., Executive Department, components of the Executive Office of the President, Inspector General office, Independent Regulatory Agency, Board and Commission, Government Corporation, or Council of the Inspectors General on Integrity and Efficiency, Architect of the Capitol, Government Accountability Office, Government Publishing Office, or the Library of Congress) and Component (e.g., Bureau, Sub-Agency or Office), including the Office of Management and Budget agency and bureau code
- Position title
- If filled, incumbent name and unique identifier (generated by OPM)
- The name of each former incumbent, going back to January 20, 2021 (see further description at “Historical Incumbencies” below)
- Type of appointment
- Geographic location (i.e., city, State or province, and country)
- Pay Plan
- Level, grade, or rate of pay
- Term length (for term and time-limited appointments)
- Expiration date (for term and time-limited appointments)
- For vacant positions, the name of the acting official or official performing the duties of the vacant position (see further description at “Acting Incumbencies” below)

Current Incumbencies

Individuals currently encumbering policy and supporting positions must be listed on the website.

Acting Incumbencies (PAS) and PTDO (non-PAS)

Agencies are directed to establish a process to document and report in ESCS acting incumbencies for individuals serving in an acting capacity in vacant PAS positions—as outlined in the Federal Vacancies Reform Act of 1998 (FVRA) or in another controlling statute that authorizes acting services for purposes of PAS positions—for those PAS

positions that the agency reports as vacant.¹ Individuals who perform the duties and functions of a PAS position in an acting capacity under the FVRA should be reported for PAS positions. Individuals who are not serving in an acting capacity under the FVRA or other applicable statute should not be reported for a vacant PAS position.

Agencies are also directed to establish a process to document and report in ESCS individuals who are “performing the duties of” (PTDO) non-PAS vacant policy and supporting positions. Individuals should be reported as PTDO if there is (a) a documented personnel action to designate that individual; (b) the individual takes up the title and duties of such a position for more than thirty (30) days, including if the individual is detailed to such a position for more than thirty (30) days. Documented personnel actions can include SF-50 for details, a delegation memo, or other formal documented designation actions. If the agency has not formally assigned any individual to take on the responsibilities of a vacant, non-PAS policy and supporting position, the agency need not input any individual as PTDO that position. No official will be listed as PTDO a vacated Schedule C position, as Schedule C positions cease to exist once vacated and therefore are not reported as “vacant” on the website.

Individuals serving “in an acting capacity” in a vacant PAS position under applicable law, and individuals PTDO a vacant, non-PAS policy and supporting position as described in the preceding paragraph, must be entered into ESCS upon the start of those duties and removed from the acting or PTDO role at the end of the period. Agencies will update OPM with their process within 30 days of the publication of these instructions by sending an email to PLUMreporting@opm.gov.

Historical Incumbencies

Individuals who previously served in policy and supporting positions that were authorized and approved by OPM are maintained in ESCS. For policy and supporting positions that exist (even if vacant) at the time of the website’s establishment or at the time of an update to the website, historical incumbents from January 20, 2021, will be listed on the website. Other noncareer SES appointments, such as SES limited term appointments (to include those authorized under an agency’s 3% cap), must be entered, updated and maintained in ESCS. For Schedule C positions, historical incumbencies will only be reflected for currently encumbered positions as those positions technically cease existing when they are unencumbered, as authority for an excepted Schedule C position is revoked when the position is vacated.

¹ The [FVRA \(5 U.S.C. 3345](#) et seq.) establishes requirements for temporarily filling vacant positions in Executive Branch agencies and generally applies to PAS positions (unless another statute creates an exception to the FVRA).

Agencies are responsible for conducting quality assurance (as described in “Quality Assurance Methods” below) to ensure all historical incumbencies are updated accurately in ESCS.

Vacant Positions

Vacant policy and supporting positions must be reported on the website. The following categories are included:

- All positions appointed by the President, by and with the advice and consent of the Senate.
 - For example, this may include, but is not limited to:
 - the heads of most major agencies (i.e., cabinet secretaries)
 - leadership at the Deputy Secretary, Under Secretary, and Assistant Secretary levels
 - the heads of most independent agencies
 - ambassadors and U.S. Attorneys
- All other positions appointed by the President, except for positions appointed under 3 U.S.C. §§ 105(a), 105(b), 106 or 107(b) that have no role relating to government policy and do not have a confidential working relationship with an official who has a role relating to government policy.
- All positions of a confidential or policy-determining character under [5 CFR 213.3301](#) (schedule C of subpart C).
- All other politically appointed positions classified at or above level GS-14 of the General Schedule (or equivalent), unless such a position has no role relating to government policy and does not have a confidential working relationship with an official who has a role relating to government policy.
- All positions designated as “general” in the [Senior Executive Service](#) (SES).
- All positions in the [Senior Foreign Service](#).

Note: Schedule C positions technically cease existing when they are unencumbered, as authority for an excepted Schedule C position is revoked when the position is vacated. Therefore, there will be no vacant position(s) to report.

Required Updates

Under [5 U.S.C. 3330f\(f\)\(2\)](#) agency heads are required to provide, at a minimum, annual updates to be published on the website. To improve government transparency and promote data accuracy, agencies should not wait to update data on an annual basis but should instead maintain current and accurate data to support efficient and timely reporting. It is the responsibility of each agency to ensure the information it has

provided to ESCS is current, complete, accurate, and reliable and is not prohibited from disclosure under federal law. Updates should be provided for all:

- policy and supporting positions in the agency (including vacant positions).
- appointees occupying such positions in the agency.
- former appointees who served in these positions in the agency, dating back to January 20, 2021.
- For each of the positions, all data elements listed under “Data Standards” above.

Data standards for these positions and incumbencies are described above under “Data Collection.” The certification statement within the ESCS certification element includes language that supports the agency requirement to provide an explanation of how the agency ensured the information is complete, accurate, and reliable.

Certification

Agency heads serve as the certifying official for information and updates reported to the website. Agency heads may delegate this role to: 1) the agency White House Liaison (WHLO) for all presidential and political appointees; 2) the agency Chief Human Capital Officer (CHCO) for policy and supporting positions occupied by career civil servants; or 3) another senior agency official. See Appendix B for more information.

Documentation

Agencies are required to keep documentation of certification (signed by the WHLO and CHCO) on file and upload a copy of the certification document into ESCS prior to certifying electronically in ESCS. Instructions for certification in ESCS are located within the ESCS platform. The certification template is located in Appendix B.

Annual Updates

Information reflected on the website will be a snapshot of time with an annual data refresh on the first day of July each year. Agencies must update their data no later than the thirtieth day of June each year. OPM will issue a data call no later than the thirty-first day of March each year instructing agencies to complete updates by the thirtieth day of June. OPM reserves the right to conduct out of cycle updates as needed or required.

Quality Assurance Methods

Data quality assurance involves the process of screening and data cleaning to ensure currency, accuracy, consistency, timeliness, and compliance.

Agencies are required to conduct quality assurance of data on a regular basis, and, at a minimum, prior to certification, to ensure all data elements are complete, accurate, and reliable. Quality checks may include:

- Crosscheck of the agency human resource information system (and/or pay system) with records within OPM's ESCS.
- Crosscheck of all required data fields against completed personnel actions.
- Update of any new and corrected personnel actions to OPM's ESCS.
- Review of random selection of records on a regular basis to ensure all data fields are completed and accurate.

Instructions for updating and cross-checking in ESCS can be found at Appendix C.

Public Feedback

Under [5 U.S.C. 3330f\(h\)\(3\)](#), the public may provide feedback on the accuracy of the information provided on the website. OPM has established an initial process for receiving public comment using a centralized email box: PLUMreporting@opm.gov. Where applicable, OPM will be responsible for distributing inquiries to agencies responsible for relevant data. Agencies are responsible for addressing feedback related to data accuracy.

Resources

OPM's Executive Services and Workforce Development Center provides resources such as "how-to" guides for ESCS and the hosting of monthly ESCS trainings to agency human resources personnel. For assistance, please email SERS@opm.gov or ESCS@opm.gov.

Appendix A

Select Definitions

AGENCY

As defined in the PLUM Act, the term “agency” includes—

- A. any Executive agency, the United States Postal Service, and the Postal Regulatory Commission;
- B. the Architect of the Capitol, the Government Accountability Office, the Government Publishing Office, and the Library of Congress; and
- C. the Executive Office of the President and any component within that Office (including any successor component), including, but not limited to:
 - 1. the Council of Economic Advisors;
 - 2. the Council on Environmental Quality;
 - 3. the Executive Residence;
 - 4. the Intellectual Property Enforcement Coordinator;
 - 5. the National Security Council;
 - 6. the Office of Administration;
 - 7. the Office of Management and Budget;
 - 8. the Office of the National Cyber Director;
 - 9. the Office of National Drug Control Policy;
 - 10. the Office of Pandemic Preparedness and Response Policy;
 - 11. the Office of Science and Technology Policy;
 - 12. the Office of the United States Trade Representative;
 - 13. the Office of the Vice President;
 - 14. the President’s Intelligence Advisory Board; and
 - 15. the White House Office, including the White House Office of Presidential Personnel.

APPOINTEE

As defined in the PLUM Act, the term “appointee” means —

- A. an individual serving in a policy and supporting position; and includes
- B. an individual serving in such a position temporarily in an acting capacity in accordance with —
 - i. sections 3345 through 3349d (commonly referred to as the “Federal Vacancies Reform Act of 1998”);

- ii. any other statutory provision described in section 3347(a)(1); or
- iii. a Presidential appointment described in section 3347(a)(2).

Appendix B

Data Verification Memo

The below certification statement should be placed on agency letterhead and signed by both parties (and/or by another senior agency official to whom the agency head has delegated the role of certifying official). The signed memo should be uploaded into ESCS.

In accordance with 5 U.S.C. 3330f(g)(2), I submit this certification that the submission of information required of the [insert name of agency or entity] is complete, accurate, and reliable.

Through the completion of an Executive and Schedule C System (ESCS) update in compliance with the Office of Personnel Management's (OPM) Periodically Listing Updates to Management (PLUM) Agency Guidance and Instructions (OPM Guidance), [insert name of agency or entity] ensured that its submission contains:

- Each policy and supporting position in [insert name of agency or entity] as defined in the OPM Guidance, including any such position that is vacant; and
- *[Beginning in April 2024]* The name of each individual who is serving in those positions or previously served in those positions on or after January 20, 2021.

Quality assurance included, at a minimum:

- A crosscheck of [insert name of agency or entity] human resource information system with records within OPM's Executive and Schedule C System (ESCS), to ensure all data elements are accurate and complete.
- Update on any personnel actions since the last submission of data in compliance with the OPM Guidance, by [insert name of agency or entity].
- Review of a random selection of records to ensure all fields are completed and accurate.

For questions regarding this submission, please contact [enter contact's name, email, and phone number].

For all Presidential and Political Appointees (WHLO or Other Senior Official Signature Required)

NAME

DATE

For all Career Senior Executive Service Members (CHCO or Other Senior Official
Signature Required)

NAME

DATE

Appendix C

ESCS Updating Instructions

1. Run your agency's "Position Incumbent List All" report.
 - a. Report can be found under the Reports tab in ESCS: select subtab "Reports."
2. Review and verify accuracy of all data shown on the incumbency report.
3. Correct/update applicable data to reflect accuracy consistent with all Quality Assurance Methods described in OPM's guidance and instructions:
 - a. For each encumbered policy and supporting position, ensure that all required data as described in OPM's guidance and instructions are accurate and consistent with data from appropriate personnel actions documentation, including approved Forms 1019 (for Schedule Cs) or 1652 (for noncareer SES'). Please be advised that revised 1019's and 1652's need OPM and PPO approval.
 - b. For vacant policy and supporting position, report the individual (if any) acting in or performing the duties of that role, as described in OPM's guidance and instructions.
 - c. Correct all typographical errors.
 - d. Replace acronyms with the full spelling.
 - e. Save updates/corrections.
4. Pull a new "Position Incumbent List All" report and verify updates/corrections are reflected.
 - a. If assistance is needed to resolve discrepancies, please email escs@opm.gov.
5. Partner with your agency WHLO and/or CHCO to conduct crosscheck for accuracy and verification.

Appendix D

Frequently Asked Questions

1. What is the PLUM Act?

The “Periodically Listing Updates to Management Act of 2022” or the “PLUM Act of 2022” is intended to improve government transparency by providing the public with more up-to-date information on the leadership and organization of federal agencies, including each administration’s top leaders, political appointees, and certain other senior positions in the federal civil service. The PLUM Act effectively puts the quadrennial Plum Book online and requires it to be updated at least annually.

2. What positions are covered by the PLUM Act?

The Act covers Policy and Supporting positions and may include:

- All positions appointed by the President, by and with the advice and consent of the Senate.
 - For example, this may include, but is not limited to:
 - the heads of most major agencies (i.e., cabinet secretaries)
 - leadership at the Deputy Secretary, Under Secretary, and Assistant Secretary levels
 - the heads of most independent agencies
 - ambassadors and U.S. Attorneys
- All other positions appointed by the President, except for positions appointed under 3 U.S.C. §§ 105(a), 105(b), 106 or 107(b) that have no role relating to government policy and do not have a confidential working relationship with an official who has a role relating to government policy.
- All positions of a confidential or policy-determining character under [5 CFR 213.3301](#) (schedule C of subpart C).
- All other politically appointed positions classified at or above level GS-14 of the General Schedule (or equivalent), unless such a position has no role relating to government policy and does not have a confidential working relationship with an official who has a role relating to government policy.
- All positions designated as “general” in the [Senior Executive Service](#) (SES).
- All positions in the [Senior Foreign Service](#).

3. Can individuals decline to be reported on the website?

No. The PLUM Act requires all policy and supporting positions for the sitting administration to be listed on the PLUM reporting website.

4. Will the White House Office of Presidential Personnel (PPO) verify agency data each year before the website update?

The Act does not require PPO to conduct verification after the 90 days following establishment of the website; however, each administration's PPO may elect to conduct verification.

5. Why is the information of Career SES being reported?

There are two types of SES positions: Career Reserved and General. SES positions are designated Career Reserved when the need to ensure impartiality, or the public's confidence in the impartiality of the Government, requires that they be filled only by career employees (e.g., law enforcement and audit positions). The remaining SES positions are designated General. A General position may be filled by a career appointee, a noncareer appointee, or by a limited term or limited emergency appointee. Because of the limitations on the number of noncareer and limited appointees, many General positions are filled by career appointees. Career appointees occupying general SES positions have historically been reported in the Plum Book and must therefore be listed on the website (to include name and salary).

6. Why is salary information included on the website?

Under 5 U.S.C. 3330f(c), the rate of pay for individuals without a level or grade must be reported. In instances where salary is listed, there is no associated level or grade for that position/incumbency.

7. How far back do incumbencies go on the website?

Historical incumbencies will be reported from January 20, 2021, forward.

8. What happens if a position is not continued?

Positions that are not continued will cease to be reported as a current data element, however, that position will still be reported as part of historical data.

9. How often will the website be updated?

5 U.S.C. 3330(f) requires that updates be published no less than once a year.

10. Are acting duties reported on the PLUM reporting website?

The names of individuals serving in policy and supporting positions in an acting capacity or otherwise performing the duties of a policy and supporting position will be reported on the website.

11. Are appointments reported on the PLUM reporting website if an individual is on detail?

An individual who holds a policy and supporting position at their home agency, but who is detailed to another position, is reported on the billet they occupy at their home agency. Additionally, if an individual (to include a detailee) is performing the duties of a vacant policy and supporting position, that individual's detail will be reported.

12. Does the website show when appointees start and end their appointment?

The historical incumbencies will include the start and end date of an appointee's appointment. Expiration dates will be included for time-limited appointments, if applicable.

13. Are part-time or unpaid appointees (for example, Special Government Employees) required to be reported?

Yes, if they are in a policy and supporting position as described in this guidance.



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