



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT  
Washington, DC 20415

The Director

## MEMORANDUM

**TO:** Heads and Acting Heads of Departments and Agencies

**FROM:** Charles Ezell, Acting Director, U.S. Office of Personnel Management

**DATE:** April 10, 2025

**RE:** Schedule C Terms of Employment Flexibilities

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This memorandum reaffirms flexibilities in setting Schedule C terms of employment.

Pursuant to 5 C.F.R. § 6.3(a), “[t]he head of an agency may fill excepted positions,” such as those in Schedule C, “by the appointment of persons without civil service eligibility or competitive status and such persons shall not acquire competitive status by reason of such appointment.” Subject to law and regulations of the U.S. Office of Personnel Management (“OPM”), “appointments and position changes in the excepted service shall be made in accordance with such regulations and practices as the head of the agency concerned finds necessary.” 5 C.F.R. § 6.3(b).

OPM regulations and guidance give agency heads great flexibility in setting the terms for Schedule C appointments. Agency heads also have authority to determine the initial salary and the frequency and amounts of pay raises of a Schedule C employee, subject to the authorities that apply to the pay system of the Schedule C position.<sup>1</sup>

Such flexibility is important to attract highly-qualified Schedule C employees to serve in important confidential, policy-determining, policy-making and policy-advocating roles. Well-qualified Schedule C employees are needed “to drive the unusually expansive and transformative agenda the American people elected President Trump to accomplish.”<sup>2</sup>

Agencies should review and, where appropriate, revoke delegations and sub-delegations provided to agency Human Resources (HR) offices for setting the terms for Schedule C appointment, including initial salary.

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<sup>1</sup> Schedule C pay is subject to applicable caps under the applicable pay system, such as the General Schedule locality pay cap of Level IV of the Executive Schedule (\$195,200).

<sup>2</sup> OPM, [Temporary Transition Schedule C and Schedule C Authorities and Noncareer Senior Executive Service Appointing Authorities](#) (January 20, 2025).

Agencies should also note that as a matter of process, Schedule C appointing authority requires approval by OPM's White House Liaison, through OPM's Executive and Schedule C System. This system serves as the central intake and approval mechanism for non-career SES and Schedule C appointing authority at the agency level. In addition, approval or withdrawal of Schedule C appointing authority requires preclearance from the White House Office of Presidential Personnel, through the agency White House Liaison. As a matter of practice, no Schedule C appointments should be advanced without coordinating with the agency White House Liaison.

If you have any questions on this or other Schedule C staffing matters, please contact the OPM AOS Group via email at [NCAP@opm.gov](mailto:NCAP@opm.gov).

cc: Chief Human Capital Officers (CHCOs), Deputy CHCOs, HR Directors, Chiefs of Staff.