



# Council of Graduate Schools

## Office of Personnel Management

### Pathways Programs: Request for Comments

September 29, 2011

The Council of Graduate Schools (CGS) is pleased to provide comments on the Office of Personnel Management's (OPM) proposed regulations to implement the Pathways Programs established by Executive Order 13562 which was signed on December 27, 2010. These proposed regulations are intended to provide clear paths to Federal internships and potential careers in government for students and recent graduates.

We are especially supportive of the inclusion of graduate students in all three of the proposed Pathways Programs. The highly-skilled talent that is developed in U.S. graduate schools is increasingly necessary to enhance our economic, social and creative capacity. The Bureau of Labor Statistics estimates that from 2008-2018 about 2.5 million new jobs will require an advanced degree; those requiring a master's degree are predicted to increase by 18% during this time and those requiring a doctoral degree by about 17%. We also note that all three programs have a strong developmental component, including training and mentoring. We believe these components will contribute to the programs' success.

Recently, CGS and Educational Testing Service (ETS) launched a new *Commission on Pathways through Graduate School and into Careers* that will offer findings and policy recommendations in a new report to be released in April 2012. The Commission is guiding a research effort addressing issues that include graduate student knowledge of career options, how students learn about occupational opportunities, the role of graduate programs and faculty in guiding students along the path to professional occupations, and career pathways that individuals with graduate degrees actually follow. We believe this new initiative and forthcoming report will be of interest to OPM and all federal agencies when it is released. The press release announcing the Commission is available at the following link: [http://www.cgsnet.org/portals/0/pdf/N\\_PR\\_PathwaysCommission\\_Sept2011.pdf](http://www.cgsnet.org/portals/0/pdf/N_PR_PathwaysCommission_Sept2011.pdf)

Specific comments by section follow:

#### **Supplementary Information:**

This section notes that each of the three Pathways programs (Internship Program, Recent Graduates Program and Presidential Management Fellows) share 5 core principles and policies established by the President in the Executive Order. CGS supports all five core principles but particularly supports principles 4 (OPM Oversight) and 5 (Agency Investment). We believe requiring agencies to enter into a memorandum of understanding (MOU) with OPM (principle 4) that sets forth the agency's obligations in using the program will be beneficial to the agency in terms of clarifying intent and objectives. Similarly, we support agency commitment to the Pathways programs participants as set forth in principle 5. This principle sets forth the core objective of the new Pathways initiative – to fulfill a need for developmental programs that will inspire interest in more permanent Federal service and that foster a positive experience for participants that will help prepare them for successful careers in government.

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We strongly support encouraging federal agencies to create cohorts of Pathways participants and to provide them with common training and developmental experiences. For graduate students in particular this type of structure and support will be very useful.

## **General Provisions Common to all Pathways Programs**

### *Agency Requirements*

The proposed regulations propose removing the existing three-way agreement between a school, student and agency that was utilized in the Student Career Experience Program and instead establishes a requirement that each individual agency sign a Pathways Agreement with each participant in its Pathways Programs. Agencies are not precluded from three-way agreements with educational institutions that sponsor programs for formal student work/academic relationships.

We encourage OPM to consider ways to publicize the Pathways program widely with the university community so that administrators and faculty are informed about it and can help inform students of the opportunity to participate in the program.

### *Program Accountability and Oversight*

The Executive Order authorizes the Director of OPM to establish if appropriate, a government-wide cap on the number of noncompetitive conversions to the competitive service of Interns, Recent Graduates or Presidential Management Fellows. We understand that OPM will monitor agencies' use of the programs and could later implement a cap if it deems necessary. Caps would apply to the number of conversions to permanent positions and not to the number of participants in the programs.

## **Internship Program**

The Internship program is established for the purpose of developing a pipeline of talent and to instill a positive impression of federal service. The proposed regulations modify the definition of student to require that an individual must be accepted for enrollment or enrolled in a degree program on at least a half-time basis. The proposed regulations make a change with regard to the duties assigned to the intern by the federal agency. The duties of the position for which the individual is hired do not have to be directly related to the Intern's academic career goals or particular field study. The rationale for this change is to provide both students and agencies with greater flexibility in terms of the type of Federal employment that may be offered to eligible students.

We understand the rationale for this change but would point out that most graduate students are likely to be interested in and attracted to internship opportunities that are related to their field of study or academic career goals.

## **Recent Graduates Program**

This program is designed to address current competitive federal agency hiring practices at entry levels that tend to favor applicants who have significant work experience. This puts recent graduates at a disadvantage regardless of the degree they possess. We strongly support the inclusion of advanced degree holders, specifically including those with master's and doctoral degrees in this program. The program will place recent graduates in a 2-year career development program in positions up to the General Schedule (GS) 9 level (or equivalent).

The regulations provide an exception to allow agencies to hire individuals for science, technology, engineering, or mathematics (STEM) occupations at the GS-11 or equivalent level, if they possess a Ph.D. or equivalent

doctoral degree directly related to a STEM position the agency seeks to fill. An additional exception is also made to allow agencies to fill certain scientific and professional research positions at the GS-11 or 12 level or equivalent if the individuals possess the requisite qualifying education. CGS strongly supports these exceptions that recognize the value of doctoral degrees in STEM fields. However, we are concerned that limiting the exceptions to STEM Ph.Ds. only may discourage many top master's students and Ph.D. recipients in non-STEM fields from considering the Recent Graduates program. We encourage OPM to consider removing the caps on pay grades to facilitate the hiring of Recent Graduate participants at the level that is appropriate for their education, experience and the position.

Other aspects of this program that we support include assignment of a mentor within 90 days of appointment, an individual development plan (IDP) within 45 days of appointment and providing Recent Graduates with a minimum of 40 hours of formal, interactive training per year (conference attendance, on-line training). All of these requirements should help achieve the goal of the program -- to develop talent and create a positive impression of a career in the federal service.

### **Presidential Management Fellows (PMF) Program**

This program has been in existence in some form since 1977 and is intended to attract highly qualified individuals with graduate degrees from a variety of academic disciplines who demonstrate an interest in, and commitment to, leadership in the Federal service.

We note that the eligibility for participants has been widened to those who have graduated within the preceding two years and that the school nomination has been eliminated. Thus, the elimination of the faculty nomination process makes sense given the widening of the eligibility window and the fact that some potential nominees may have been off campus for up to two years.

We support the expansion of the eligibility window for applicants to the PMF programs as part of the effort to make it more "student friendly" by aligning it with academic calendars and including those who have received a qualifying advanced degree within the preceding two years.

As is the case with the Recent Graduates Program, the PMF is a two-year development program and upon completion of the program a PMF may be converted to a competitive federal civil service job. The proposed regulations require agencies to approve an Individual Development Plan for each of their Fellows as well as developmental activities and interactive training. Each PMF must be assigned a mentor who is a member of the Senior Executive Service (SES) or equivalent (and is not a part of the PMF's supervisory chain of command) to provide advice and counseling on a myriad of career decisions, such as training and developmental activities. We believe these requirements should help make the Fellowship experience positive and promote interest in pursuing a career in the federal government.

In conclusion, we note that the creation of the OPM Pathways programs is very timely given projected retirements for federal workers and the need to revitalize and replenish the federal workforce. We support the inclusion of graduate students and recent recipients of graduate degrees in all three pathways programs. Providing students with more information about careers in government along with internships and other developmental opportunities should be a win-win situation for students, the government and ultimately the country. We look forward to working with OPM as this important initiative moves forward. Thank you for the opportunity to submit comments on the OPM Pathways program. For additional information please contact Patricia McAllister at (pmcallister@cgs.nche.edu) or 202-223-3791.