



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

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PERSONNEL BULLETIN NO. 24-08

SUBJECT: Department of the Interior Pathways Program

1. Purpose.

This Personnel Bulletin (PB) provides Department-level policy for use of the Pathways Program. Effective immediately, this PB supersedes PB 13-04 and PB 09-04. All Bureaus and equivalent Offices must update their internal Pathways Programs policies to reflect the guidance established in this PB and regulations established in 5 Code of Federal Regulations (CFR) 300, 5 CFR 362, and 5 CFR 410.

2. **Authority.** Executive Order 13562, 12015; Title 5 CFR Parts 213, 300, 302, 315, 330, 334, 335, 351, 362, 410, 430, 531, 537, 550, 575, and 890.

3. Background.

The Pathways Program offers federal internship and employment opportunities for current students, recent graduates, and those with an advanced degree. There are three Pathways Programs:

- **Internship:** Provides current high school, undergraduate, and graduate students with opportunities for paid work in agencies and to explore Federal careers. Applicants must be enrolled at least part-time in school or an educational program (including Registered Apprenticeship Programs and certain volunteer service programs). Interns must complete a minimum of 480 internship hours (320 hours if they receive a waiver) to be eligible for conversion.
- **Recent Graduates:** Provides recent graduates with one to two-year developmental experiences in Federal agencies. Applicants must have graduated from a qualifying educational institution or career or technical education program within the previous two years. (Veterans unable to apply due to service obligations have up to six years after degree completion to apply).
- **Presidential Management Fellows (PMFs):** Provides advanced degree candidates and graduates the opportunity to participate in the Federal government's premier two-year leadership development program. Individuals must apply within two years of completing an advanced degree defined as a masters, professional (for example, law), or doctorate. PMFs are assigned a mentor, participate in professional development, and complete at least 80 hours of formal, interactive training, an Individual Development Plan (IDP), and at least one developmental, rotational assignment.

4. Definitions.

- Pathways Program Participant – An individual appointed under one of the three Pathways Programs:
 - Internship Program – The Internship Program exposes current high school students, undergraduate students, including those enrolled in community and technical colleges, and graduate students to the work of Government by providing paid opportunities to work in agencies and explore Federal careers while still in school.
 - Recent Graduates Program – The Recent Graduates Program (Recent Graduates) provides opportunities for individuals who have received qualifying degrees or certificates within the previous two years (up to six years for qualifying veterans) to obtain entry-level developmental experience designed to lead to a career in the Federal Government after successfully completing the Program, which is generally one year in length and in certain cases may be two years in length.
 - Presidential Management Fellows Program – The Presidential Management Fellows (PMF) Program promotes careers in the Federal Government by offering leadership development opportunities to individuals who have received advanced degrees within the preceding two years.
- Student - An individual who has been accepted for enrollment or who is enrolled and seeking a degree (diploma or certificate) in a qualifying educational institution on a full or half-time basis (half-time is defined by the educational institution in which the student is enrolled). Students need not be in actual physical attendance in school, so long as all other requirements are met. An individual who needs to complete less than the equivalent of half an academic/vocational or technical course load in the class enrollment period immediately prior to graduating is still considered to meet the definition of a student and meets the eligibility requirements of the Internship Program.

Eligibility for the Pathways Internship and Recent Graduates Programs includes 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). Participants of AmeriCorps and similar programs are required to fulfill at least 1700 work hours within a twelve (12) month period and those who meet this requirement within ten (10) or eleven (11) months are considered to have successfully completed the program.

- Pathways Programs Officer (PPO)/Presidential Management Fellows (PMF) Coordinator - A Departmental employee who is in a position, at the headquarters at or higher than a GS-12 or equivalent under the Federal Wage System or other pay and classification system.
- Bureau Pathways Programs Coordinator (PPC) – A Bureau Headquarter Level employee that works with the PPO, in developing and reporting on bureau

Pathways programs.

5. Responsibilities.

- U.S. Office of Personnel Management (OPM)
 - Works with Agency PMF Coordinator and supervisor to identify and advertise PMF Positions.
 - Coordinates with Agency PMF Coordinator and Supervisor to ensure that position descriptions are properly classified and completed for the new position.
 - Works with Agency PMF Coordinator and Supervisor to prepare for the hiring fair.
 - Works with Supervisor, Agency PMF Coordinator, and Pathways Programs Officer to participate in a hiring fair for PMF hiring at your agency.
 - Coordinates with Agency PMF Coordinator to gain access to the PMF Talent Management System (TMS) to post PMF appointment opportunities (job opportunity announcements), manage applicants, and record initial appointments.
 - Coordinates with Agency PMF Coordinator to gain access to the PMF TMS to search and review Finalists, including their resume and transcripts.
 - Coordinates with Agency PMF Coordinator and Supervisor to schedule and carry out interviews with Finalists.
 - Completes prior to Entrance on Duty requirements such as, but not limited to Making Final/Official Appointment Offer, Schedule Orientation, Arrange for Fellow to obtain PIV card, and all coordination with Fellow's Supervisor.
 - Supports the PMF Fellow's first day activities, such as orientation, supply onboarding paperwork, confirm PMF Program Participant Agreement has been completed, and deliver Fellow to Supervisor.
 - Monitors PMF Fellow's progress during the program's two-year duration, by notifying Supervisor when Fellow is eligible for step increase or promotions, process personnel actions, and ensure Fellow obtained a favorable Executive Review Board (ERB) certification for the noncompetitive conversion to a term or permanent position at the conclusion of fellowship.

- Department of the Interior’s Office of Human Capital
 - Provides Pathways Programs advisories and accountability functions of all Bureaus and equivalent Offices.
 - Monitors and assesses Pathways Programs operations and reports results to the U.S. Office of Personnel Management (OPM).
 - Appoints a Pathways Program Officer and Agency PMF Coordinator who:
 - Is at the agency’s headquarters level in a position at or higher than grade 12 of the General Schedule (GS), or equivalent.
 - Is responsible for administering the agency's Pathways Programs, including coordinating the recruitment and on-boarding process for Pathways Programs Participants, and coordinating the agency's Pathways Programs plan with agency stakeholders and other hiring plans (*e.g.*, merit promotion plans, agency plans pursuant to Executive Order (E.O.) 14035, “Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce”).
 - Serves as a liaison with OPM by providing updates on the agency's implementation of its Pathways Programs, clarifying technical or programmatic issues, sharing agency best practices, and other similar duties.
 - Reports to OPM on the agency's implementation of its Pathways Programs and individuals hired under these Programs.

- Bureau Human Capital Offices
 - Establish bureau specific policies or guidance, as needed, related to the Pathways Programs that align with Department and OPM policies.
 - Establish written oversight procedures to ensure proper use of the Pathways Programs. The Department as well as OPM may review the use of this program under its accountability program.
 - Provide information to the Department and OPM about opportunities for individuals interested in participating in the Pathways Programs, as appropriate.
 - Adhere to any limiting guidelines on conversion of Pathways Programs participants imposed by the Department or OPM.
 - Designate a Pathways Programs Officer and Presidential Management Fellowship Officer to administer their Programs, to serve as liaison with the Department and OPM, and to report to the Department and OPM on the implementation of the Pathways Programs and the individuals hired under them.

- Establish bureau process to effectively use OPM's Intern Talent Program.
- Adherence to Pathways reporting requirements referenced within this policy.
- Servicing Human Resources Offices (SHROs).
 - Ensure Human Resources staff is trained to understand the requirements, intent, and operations of the Pathways Programs, and provide accurate and appropriate guidance and assistance to applicants, employees, and management.
 - Post all job opportunities for Pathways Internship and Recent Graduates positions with USAJOBS. This can be a traditional searchable announcement on USAJOBS website or a USAJOBS custom job announcement on an official, public facing website (e.g., doi.gov, nps.gov). These options may be supplemented with additional recruitment and advertisement activities such as postings on third-party websites and/or social media.
 - Perform quality control on all the announcement requirement for internal vacancy announcements for current Pathways Interns.
 - Advise all supervisors of Pathways recruitments in developing meaningful developmental work and set clear expectations based on the position description(s) regarding the work experience of the Intern, Recent Graduates or PMF.
 - Advise supervisors on the recruitment and on-boarding process for Pathways Programs participants.
 - Support as necessary, supervisors and Pathways participants, in the preparation of the Individual Development Plan for each Intern without a not to exceed date, Recent Graduate and PMF participants within the required timeframes.
 - Assist supervisors, as necessary, in developing performance plans.
 - Use appropriate merit-based procedures for recruitment, assessment, and placement of Pathways participants. Assessment methods may include Rule of Three, Unranked, and Category Rating method.
 - Ensure adherence to Veterans' preference requirements in accordance with the provisions of 5 CFR Part 302.
 - Validate participants meet the criteria to be appointed in the Pathways Programs as stated under 5 CFR 362.203(c). These criteria include but are not limited to requirements related to all Federal appointments such as qualification standards and suitability.
 - Ensure a Pathways Participant Agreement is signed by each program

participant.

- Provide information to OPM about opportunities for individuals interested in participating in the Pathways Programs, as appropriate.
 - Adhere to any limiting guidelines on conversion of Pathways Programs participants imposed by OPM.
 - When possible SHROs should participate in job fairs to recruit for vacant Pathways positions.
- Supervisors
 - Identify positions in their organization to be filled through the Pathways Programs.
 - Participate or send representatives to job fairs to recruit for vacant Pathways positions.
 - Issue critical elements and performance standards as required by the Department's performance management system.
 - Create and issue Individual Development Plans (IDPs) for Pathways recruits consistent with the critical elements and performance standards of the position being filled.
 - Evaluate performance and ensure that the participants have a clear understanding of the evaluation. Provide counseling and guidance to when performance is determined to be less than satisfactory in accordance with the Department's performance management system.
 - Monitor PMF developmental assignments of the Pathways participants.
 - Ensure Pathways Interns on appointments greater than 90 days, receive appropriate training opportunities may include but are not limited to on-the-job training activities, formal training classes, mentoring sessions, testing products or tools, organizing work activities or functions, and assisting colleagues with projects or tasks.
 - Ensure Recent Graduates and PMF participants receive formal training and development to acquire the appropriate competencies needed for conversion.
 - Provide training and developmental experiences for participants which will be evaluated and used to determine eligibility for conversion to the competitive service.

- Consult with SHRO to make a recommendation, ninety (90) days prior to the completion of the Pathways requirements, to convert or not convert a program participant upon completion of their Pathways Program.

6. Program Requirements and Key Components.

- Adherence to Merit System Principles – The Department will provide equal employment opportunity in all actions taken under the Pathways Programs. All actions to evaluate, appoint, develop, and promote individuals under the Pathways Programs will be based on merit and made without regard to race, ethnicity, color, religion, sex (including pregnancy and gender identity national origin), age, disability, sexual orientation, genetic information, or any other non-merit -based factor.
- Workforce Planning – OHC, SHROs, budget offices, and supervisors shall ensure workforce plans include the use of the Pathways Program and identify a sufficient number of positions to allow for the conversion of Pathways Programs participants upon successful completion of the program.
- Qualifying Education - Regulations governing the Pathways Programs identify qualifying education that Program participants must be pursuing or have completed in order to meet the Pathways Program eligibility requirements.
 - Secondary Education - A high school or home - school curriculum that has been approved by a State or local governing body is considered qualifying.
 - Post Secondary Education - Educational institutions and curricula listed below must be accredited by an accrediting body recognized by the by the Secretary of the U. S. Department of Education to be qualifying education.
 - Technical or Vocational School
 - Two-year or Four-year College or University
 - Graduate or Professional School (Law School, Medical School)
 - Qualifying Career or Technical Education Program (Registered Apprenticeship Programs, Job Corps, Climate Corps, AmeriCorps, and Peace Corps).
 - Home School*

*Under the Pathways Programs, the definition of qualifying educational institution includes certain home-school curricula. To be included, secondary home-school programs must be recognized by the state or local government oversight agency. For post-secondary, vocational or technical home- school programs, the curricula must be approved by an organization recognized by the

U.S. Department of Education. For additional information, refer to the U.S. Department of Education website at www.ed.gov. Students participating in these recognized home- school curricula may apply for consideration under the Pathways Programs. Since requirements and standards for homeschooling vary from state to state, servicing HR offices must determine the eligibility of a home – schooled student applicant as defined by the state of residence.

- Certificate Program - A certificate program consists of post-secondary education, in a qualifying educational institution, as defined 5 CFR 362.102, equivalent to at least one academic year of fulltime study that is part of an accredited college-level technical, trade, vocational, or business school curriculum. Short-term training programs (e.g., several two (2) week programs completed, or class sessions attended over a period of 2 years) are not considered an academic course of study.
- Individual Participant Agreement – The Department (via the servicing Bureau or equivalent office) must enter into an agreement with each Pathways Program participant it employs, defining the roles and responsibilities of each party to the agreement. When a Pathways Program participant moves between agencies or to another bureau within the Department, a new participant agreement must be created and signed. Agreements must include and address the following:
 - A general description the duties to be performed based on the position description.
 - Work Schedule.
 - Length of appointment and termination date.
 - Procedures and requirements for evaluating Pathways Program participants, including frequency of evaluation. Must meet or exceed the number of required evaluation discussions identified in the Department’s Performance Management Handbook.
 - Requirements for continuing and successful completion of the program.
 - Minimum eligibility requirements for non-competitive conversion to term or permanent appointment in the competitive service under the specific Pathways Program in which the employee is employed.
- Developmental Activities – Servicing Bureau Human Resources Offices or Servicing Human Resources Offices (in coordination with the organization where the Pathways member is placed) may provide an orientation program for each class or cohort of Fellows and may provide information on available training opportunities.
- On-Boarding – The Servicing Bureau Human Resources Office has established the process to provide a consistent on-boarding experience for all new Interns and Recent Graduates.

- Qualifications and Eligibility – Applicants must meet all eligibility and qualification requirements for the Pathways position(s) being filled, including, general and/or specialized experience as defined by the OPM, or by the agency for positions not covered in OPM's standards, any positive education requirements and selective placement factors identified for the position, any special conditions of employment associated with the position, and achieve a passing score on any required tests/assessments.
- Classification of Positions:
 - Intern Positions that are classified to the General Schedule (GS) must be classified as student trainee, in the GS-xx99 series of the appropriate occupational series for use in the Internship Program. Positions that are classified to the Federal Wage System must be classified as student trainee in the WG-xx01 series of the appropriate occupational group.
 - Recent Graduates and PMF Positions are classified using standard occupational series.
- Tenure Group – For the purpose of reduction in force (RIF) under 5 CFR 351, interns serving in an appointment expected to last more than one year are placed in excepted service Tenure Group II; interns serving in an appointment not to exceed one year or less are placed in excepted service Tenure Group 0; interns serving under an appointment not to exceed one year but who have completed one year of current continuous service are placed in excepted service Tenure Group III. Recent Graduates and Presidential Management Fellows are placed in excepted service Tenure Group II.
- Movement between Agencies – Participants in the Recent Graduates and PMF programs may receive a new appointment with another agency as long as it meets all the requirements for both programs. To move from one agency to another the program participants must separate from the current employing agency and be appointed into the new agency without a break in service. Time served in the previous agency is credited towards the program requirements for the Recent Graduates and PMF programs. A new training period is not required in the new agency because there is no break in service.
- Interior must identify program requirements for Program completion and eligibility for conversion for those Recent Graduate participants acquired from another Federal agency. For PMF participants, their previous agency must notify OPM when the Fellow is appointed within the Department and if the appointment occurs within the first six months of the Fellow's tenure, the losing agency may request reimbursement of one-quarter of the placement fee from the Department.

7. Filling Positions.

- Job Opportunity Announcements (JOA) – All JOAs for employment in the Internship and Recent Graduates Pathways Programs will be posted on USAJOBS traditional announcement, a USAJOBS custom job announcement on an official, public facing website (e.g., doi.gov, bureau websites), or minimum qualification announcement with the requirements for currently employed interns. JOAs will include the following information:
 - Announcement Number
 - Position Title, Series, Grade, and Duty Station Location
 - Full-Performance Level of the Position
 - Salary
 - Employing Office Name
 - Number of Positions
 - Open and Close Dates
 - Geographic Location/Area of Consideration
 - How to Apply (including additional required documents):
 - Resume
 - Transcripts
 - Veterans Documents (DD 214, Orders, VA Letters, etc.)
 - Student Documents (Registration, Tuition Bill, Transcripts, Acceptance Letter)
 - Servicing Human Resources Office Point-of-Contact and How to request additional information
 - Other pertinent information
- Geographic Location/Area of Consideration (AOC) – The AOC may be limited to the city or region where the Pathways position is located. Pathways Intern participants must live or attend school in the area of consideration.
 - Remote work and telework are allowable options and must be properly identified in the JOA.
- Career Transition Assistance Program (CTAP), Interagency Career Transition Assistance Program (ICTAP), and Priority Reemployment List (PRL) – It is not a requirement to clear CTAP/ICTAP when recruiting Pathways applicants. However, all Pathways recruitments are required to clear the PRL.
- Citizenship – A non-citizen may be appointed to a Pathways Program provided the individual is lawfully admitted to the United States as a permanent resident or is otherwise authorized to be employed, if it is permitted by the annual appropriations act, immigration laws, and the Department’s internal policies. A Pathways Program participant must be a U.S. citizen to be eligible for non-competitive conversion to a position in the competitive service.
- Employment of Relatives – A Pathways Program participant may work in the same agency with a relative when there is no direct reporting relationship and the relative is not in a position to influence or control the participant's appointment, employment, promotion, advancement or conversion within the agency.

8. Accepting Applications.

- All Department of the Interior JOAs must include complete and clear instructions to the applicants on how to apply for Pathways positions. The SHRO must identify how applications/resume may be received (automated system, facsimile, or email). Applicants must submit all other required documentation (e.g., transcript, DD-214) to substantiate their eligibility and qualifications for the program under which they are applying.

Applications must be accepted from Veterans outside of the area of consideration.

9. Evaluating Candidates.

- HR offices will use the OPM Qualifications standards or bureau-developed qualification standards (e.g., Title 25 positions) to evaluate candidates' minimum qualifications for the position and grade level being filled. To be eligible for appointment under any Pathways Program, candidates must meet all qualifications requirements, including any positive education requirements and/or selective placement factors, and any other designated special qualifications requirements and conditions of employment (e.g., medical standards) appropriate to the specific position.
- Each bureau must have an established policy to address applicant reconsideration requests. This policy does not need to be specific to reconsideration of Pathways applicants. If an applicant does not believe they were rated properly, and wishes to have a rating reconsidered, a written request for reconsideration must be filed with the Servicing Human Resources Office that processed the recruitment action. The request must specify why the applicant believes the original rating was improper, what factors were not considered, and any other pertinent information that will support the request and enable the HR office reviewer to re-evaluate the original rating. Any new information, experience or education received after the closing date of the vacancy announcement associated with the reconsideration request cannot be considered.

The reconsideration request will be evaluated by a qualified staff member not associated with the original rating. Upon completion of this re-evaluation, the qualified staff member will provide the applicant with an explanation that supports the reconsideration decision. That review and rating is considered final, and there is no further appeal.

10. Application of Veterans Preference.

- The procedures outlined in 5 CFR 302 must be followed when filling positions under any Pathways Program. Selections will be made in accordance with the requirements of 5 CFR 302.401 and Veterans preference laws.
- Each Servicing Human Resources Office is responsible for ensuring that any candidates entitled to priority consideration as defined in 5 CFR 302.103 receive it.

11. Referral and Selection of Candidates.

- Referral and selection of Interns and Recent Graduates will be made in accordance with procedures outlined in 5 CFR 302.304 and 5 CFR 302.401. Candidates may be referred by using a numerical ranking method such as Category Rating, Ranked List (similar to the rule of three), or Unranked method.
- When category rating is used, the definitions of the categories and the quality ranking factors used must be recorded and retained in the recruitment case file.
- Preference - eligibles with a compensable service - connected disability of 10% or more, who meet the minimum qualifications for the position, "float to the top" (i.e., they are placed at the top of the highest category), with the exception of positions that are scientific or professional, GS-9 level or equivalent or higher.
- OPM makes the final determination on objections on qualifications which result in the Passover of a compensable preference eligible (CPS) veteran with a disability of 30% or more.
- The selecting official is required to provide the reason(s) for their selection(s) to provide complete documentation for the recruitment case file. Documentation must support the hiring decision with specific details identifying why the candidate was selected. For example, describe the qualities that differentiated the candidate from other candidates.

12. Appointment/Agreement Extension.

- An extension to the appointment and/or agreement of a Pathways Program participant in either Pathways Intern Program, the Recent Graduates Program, or Presidential Management Fellows Program may be requested. There are no provisions in regulations for extensions beyond the related limits of the program. All extensions must be approved prior the end date of the participant's appointment and/or agreement. HR offices may grant a 180-day extension of an Intern without a not-to-exceed date, and 120-day extension for Recent Graduate or PMF appointment for the following circumstances:
 - Approved leave for medical reasons
 - Delayed completion of required training due to events beyond the participant's control
 - Military obligation
 - Bereavement
 - Other unforeseen circumstances which render an exception necessary (will be reviewed on a case-by-case basis)
 - Requests will be made in writing at least 30 days in advance of the participant's expiration of appointment.

- Extensions will not be approved for additional training or administrative errors.

13. Termination of Appointment.

- The appointment of a Pathways Program participant may be terminated at any time for reasons which include those relating to misconduct, poor performance, suitability, lack of funds, or change in priorities (e.g., a program or function is eliminated).

While Interns are covered by Reduction in Force procedures, Interns agree to a condition of employment where Intern appointments expire 180 calendar days after completion of the designation academic course of study or career and technical education program, unless the participant is selected for a noncompetitive conversion.

- The appointment of a Pathways Program participant who is not converted to a term, career-conditional or career appointment in the competitive service automatically expires at the end of their appointment or bureau approved extension, if applicable. Therefore, the appointment of any Interns, Recent Graduates, or Presidential Management Fellows who have not been converted at the end of the program period must be terminated. Pathways Program participants who cannot be converted for reasons other conduct or performance can be entered in USA Staffing's Intern Talent Portal, with a positive recommendation from the participant's supervisor.
- Guidelines for terminating participants in the Presidential Management Fellows Program can be found within OPM guidelines on the program.
- As a condition of employment, a Recent Graduate appointment expires at the end of the one (1) year program period, plus any bureau-approved extension, unless the participant is selected for noncompetitive conversion under 5 CFR 362.306.
- A Recent Graduate who held a permanent, career-conditional or career, appointment with Interior immediately before entering the Program, and fails to complete the Program for reasons that are not related to misconduct, poor performance, or suitability, may be placed in a permanent competitive service position for which the individual meets all eligibility and qualification requirements if one is available.

14. Documenting the Appointment.

- Appointments made under the Pathways Programs are under Schedule D and will be documented with the appropriate nature of action and legal authority codes from OPM' s Guide to Processing Personnel Actions.

15. Performance Evaluation of Pathways Participants.

- Pathways Programs participants, specifically Interns (without a not to exceed date), Recent Graduates and Presidential Management Fellows, are Federal employees subject to performance management provisions of 5 CFR 430 and are required to have performance plans. Please reference the Department of Interior' s Performance Appraisal Handbook for further guidance.

16. Delegations of Authority.

- The Department delegates authority to the Bureaus/Offices to manage the Pathways Programs in accordance with Departmental policy and OPM Pathways Programs regulations.

17. General Provisions.

- Certain aspects of the Pathways Programs are common to the Internship Program, Recent Graduates Program, and PMF Program. This section addresses the overarching requirements of the three programs and procedures to implement and utilize the Pathways Programs.
- Internship Program.
 - Qualifications and Eligibility.
 - Individuals must meet the qualifications and eligibility requirements throughout the duration of the Internship appointment. Prior to initial appointment, Interns must provide documentation of student status. Such documentation may be in the form of an official copy of school transcript, documentation of registration, tuition bill, or a copy of the acceptance letter from the college or university for new students. Interns must provide a copy of up-to-date transcripts (unofficial) at the end of each academic year, unless requested more frequently by the supervisor or Servicing Human Resources Office, for verification of enrollment and academic standing as proof of continuing eligibility for participation in the Intern Program.
 - Appointment.
 - Interns are appointed using Schedule D, excepted service appointing authorities, as provided for in 5 CFR 362.203(d), i.e., using the appointing authority provided in 5 CFR 213.3401.

- Appointment may be on a temporary basis, not to exceed one (1) year or less, or for an initial period that is expected to last more than one (1) year. Such temporary appointments may be appropriate for employment during the traditional summer months. The time limitations found in 5 CFR 213.104 and 5 CFR 316.401, do not apply to individuals hired under the Pathways Intern Program.
- An Intern with a not-to-exceed date may be converted to an appointment without a not-to-exceed date once the bureau/office has met OPM's internal or external notice requirements in accordance with 5 CFR 213.3401.
- An Intern serving under an appointment for an initial period expected to last more than one (1) year is placed in Tenure Group II in the excepted service for purposes of 5 CFR 351.502 and is afforded the same retention rights as other excepted service employees. An intern hired on an appointment not to exceed one year is placed in Tenure Group 0.

An Intern serving under a temporary appointment that has completed one (1) year of current continuous service and whose appointment is extended for an additional period of time is placed in excepted service Tenure Group III.

- The agreement with the student must identify an agreed upon schedule of school and work to ensure work responsibilities do not interfere with academic performance. The agreement will be revised as necessary to update changes to the school/work schedules. When revising the agreement, requirements for completion of program requirements must be reviewed to make sure the participant can still meet the requirements by the establish timeline.
 - Participants will agree that completion of educational and Internship Program requirements will be accomplished within a reasonable and appropriate time frame.
- Training and Development.
- Per Individual Development Plan Requirement Memorandum from the Department's Chief Human Capital Officer, dated November 2, 2023, all employees without a not to exceed date are required to be placed on an Individual Development Plan.
 - Interns on a continuous appointment lasting longer than twelve (12) weeks must be placed on an Individual Development Plan that outlines the formal and development designed to assist the Intern acquire the competencies of the target position to which the Intern may be assigned upon completion of the program.

- Promotions, Reassignments, Details, and Temporary Promotions.
 - An Intern without a not-to-exceed date may be promoted to the full performance level stated in the original vacancy announcement from which they were selected from, as long as all eligibility and qualification requirements for the position to which they are being promoted are met. However, this provision does not confer entitlement to promotion.
 - A promotion of an Intern with a not to exceed date must meet OPM's internal/external notice requirements before processed as a conversion to another Schedule D excepted service appointment using the original not-to-exceed date of the current appointment.
 - An Intern with a not-to-exceed date may be reassigned to another organization within the bureau/office if the position is the same series, grade, location and meets the qualification standard requirements. The expiration date of the current appointment must remain the same.
 - An Intern without a not-to-exceed date may be reassigned to another bureau organization if the position is the same grade, full performance level and meets the qualification standard requirements.
 - An Intern without a not-to-exceed date may be reassigned to another bureau organization if the position is the same grade and higher full performance level after competing through an internal bureau announcement.
 - An Intern with or with a not-to-exceed date may be detailed up to 120-day increments up to one (1) year to unclassified duties in the same grade or lower-graded positions.
 - An Intern without a not-to-exceed date may be detailed to higher graded positions not to exceed 120 days.
 - An Intern without a not-to-exceed date may be detailed beyond 120 days to another bureau/office organization if the position is to a higher grade after competing through an internal bureau announcement.
 - An Intern without a not-to-exceed date may be temporarily promoted to a higher-graded positions not to exceed 120 days and meets the qualification standard requirements.

- Conversion of Interns to the Competitive Service.
 - An Intern who is a U.S. citizen may be non-competitively converted from the Internship Program to a term or permanent position in the competitive service when the Intern completes all requirements identified in the service agreement.
 - Completed at least 480 hours of work experience acquired through the Internship program while enrolled as a full or part time, degree or certificate seeking student or participant in a career or technical education program. Up to 160 of the 480-hour service requirement may be waived when an Intern completes 320 hours of career related experience or other experience that may be credited in accordance with 5 CFR 362.204(c) or 5 CFR 362.204(d).

The hours of work experience requirements must be completed while the Intern is still enrolled in school. The 180 days after completion of the agreed education requirement cannot be used to meet the work experience requirement.

The Department will accept the submission of a recommendation letter from an instructor or program administrator that reflects the Intern to demonstrate high potential in their academic or career and technical education program. The Intern participating in a career or technical education program must demonstrate exceptional job performance just as an Intern enrolled in a qualifying educational institution.

- Pathways interns must be converted within 180 days of completing degree, career, or technical educational program.
- Received a favorable recommendation for conversion from the work experience supervisor (whether the work experience was completed at Interior or at another agency).
- Met all the qualifications and eligibility requirements for the position to which the Intern will be converted and all specific requirements identified in Interior's Pathways Agreement with the Intern. An intern may be converted to a position in another career field, for which qualified, only when there is no permanent position related to the Interns field of study at the end of the Internship to which the Intern can be appointed.
- An Intern may be converted to a position in the bureau in which the participant has served the Internship or to a position in another federal agency.

- An Intern who has been noncompetitively converted to a term appointment may be subsequently noncompetitively converted to a permanent competitive service position. The effective date of the conversion to a permanent appointment must be before the expiration date of the term appointment.
- The provisions of the Career Transition Assistance Programs (CTAP) do not apply to the conversions of Interns to the competitive service.
- Time spent in a Pathways position (with or without a not-to-exceed date) counts toward completion of the probationary period when the incumbent is noncompetitively converted to a permanent position in the competitive service upon completion of the program.
- Time spent in a Pathways position (with or without a not-to-exceed date) counts toward career tenure when the incumbent is noncompetitively converted to a permanent position in the competitive service upon completion of the program. Time spent in a Pathways position with a not-to-exceed date counts toward completion of the career tenure when noncompetitively converted to a permanent position without a break in service in the competitive service upon completion of the program.
- If the employing office wishes to convert an Intern to the competitive service upon successful completion of the Intern program, a request for personnel action must be submitted to the Servicing Human Resources Office to process the conversion. If the conversion action is not processed, the Pathways appointment will expire, and employment will be terminated. Additionally, any Intern who fails to maintain eligibility to continue in the Intern Program (e.g., does not meet definition of student, or fails to adequately progress toward completion of the academic program) must be terminated.
- The position to which an Intern is converted may be part of a career ladder. The same full performance level (FPL) that was identified on the original vacancy announcement, must be identified at the time of the conversion, and employees can only be promoted non-competitively up to the FPL of the advertised career ladder. Competitive procedures must be used to promote an employee to grade that exceeds the established FPL or to place an employee in a career ladder position with a higher Full Performance Level (FPL).

- Breaks in the Internship Program.
 - A break in the Internship Program is defined as a period of time when an Intern is working but is unable to go to school or is neither attending classes nor working at the agency. The bureau/office must have a written process to receive and consider a participant's request for a break in the Internship Program. The bureau/office may use its discretion in either approving or denying a break in Program.
- Recent Graduates Program.
 - Qualifications and Eligibility
 - To be eligible, applicants must apply for a Recent Graduate position within two (2) years of completing a qualifying educational program, i.e., within the previous two (2) years, the Recent Graduate must have completed a qualifying associate, bachelors, masters, professional, doctorate, vocational, or technical degree or certificate from a qualifying educational institution. Except as provided for in bullet below, an application will be considered only if it is received no later than two (2) years from the date all requirements for a qualifying degree or certificate were met. Applicants who apply to Recent Graduates job announcements within the two (2) year time limit may be considered and appointed even if the appointment does not occur until after the two (2) year time limit.
 - The two (2) year period of eligibility will be extended for veterans who are precluded from applying within the two-year window due to a military service obligation. In such cases, veterans will have up to 6 years from the date of discharge or release from active duty to apply for the Recent Graduates Program. Eligibility cannot extend for more than 6 years after the date on which the individual completed his or her educational requirements.
 - OPM qualification standards for the occupation and grade level of the position being filled will be used to evaluate candidates for positions for appointment under the Recent Graduate program.
 - Appointment.
 - Under the Recent Graduates Program, individuals are given a one (1) year appointment to an entry-level position designed to provide a developmental experience that will lead to a career and permanent position in the federal government. Recent Graduate Programs that exceed the one (1) year appointment limitation must be approved by the Servicing Bureau Human Resources Office. Recent Graduates are placed in Tenure Group II in the Excepted Service.

- Recent Graduates are appointed under Schedule D, using the appointing authority provided in 5 CFR 213. 3402(b). See OPM’s Guide to Processing Personnel Action and related Departmental policies for Nature of Action and Legal Authority Codes required to document appointments under the Recent Graduates Program.
 - Recent Graduates may be appointed to any position filled under this authority for which qualified up to the GS-11 level or equivalent.
 - Appointment may be made at the GS-12 levels for filling certain science, technology, engineering, and mathematics Science, Technology, Engineering, and Mathematics (STEM) positions in accordance with 5 CFR 362.303(b)(3)(ii) through (iv).
 - Positions to which Recent Graduates are appointed must provide career advancement, i.e., are part of a career ladder progression that will enable the participant to gain experience and assume more responsible duties as competence is gained and be promoted to higher grade levels when all eligibility and qualification requirements are met. To gain this experience, selective applicants must be appointed at a level below the Full Performance Level (FPL). The FPL of the career ladder must be identified at time of recruitment and appointment.
 - The duration of the Recent Graduates appointment in the excepted service is a trial period.
- Training and Development.
 - Within the first 45 days of appointment, the supervisor, in coordination with the Recent Graduate participant, will create an Individual Developmental Plan (IDP) that outlines the specific developmental activities designed to help the Recent Graduate acquire the competencies of the target position in which the recent Graduate will be placed upon completion of the program. The developmental activities to be included in the IDP are as follows:
 - On-the-Job Training (i.e., daily instruction and guidance designed to prepare the employee to assume progressively more difficult, responsible, and productive work, and that must constitute at least 50 percent of the developmental activities).
 - At least forty (40) hours of formal, interactive training which may include conference attendance, on-line training, and/or classroom training, that must be provided during the year in the program.
 - The IDP will identify appropriate sources and content of developmental activities and formal interactive training and expected timeframes for completion of developmental activities and training.

- IDPs will be reviewed and revised as necessary to ensure the training activities originally identified are meeting developmental goals and are being completed.
 - Within 90 days of appointment, each Recent Graduate must be assigned a mentor from outside their chain of command. The mentor is typically a senior or journey-level employee who can provide the participant with the guidance and support needed to develop effectively in the workplace; a trusted advisor, to share with the employee a different focus or perspective from the technical emphasis on the job and oversight that the supervisor provides; a role model who shares their expertise with less experienced individuals in order to help the Recent Graduate understand the workplace culture and effectively build workplace relationships. The mentor does not have to be in the same occupational field as the Recent Graduate but should be available as a counselor who can properly advise on work-related and personal workplace issues that may arise.
- Promotions.
- Any Recent Graduate participant who meets eligibility and OPM qualification requirements may be promoted. Supervisors must evaluate the quality of each employee's work and level of proficiency demonstrated in the performance of assignments, document successful completion of all training requirements and provides a recommendation for the promotion to interim grade levels and position if in a career ladder. A Recent Graduate participant will be eligible for promotion only if their performance is at least at the Fully Successful level. There is no entitlement for a promotion.
 - The intent of the Recent Graduates program is to provide a developmental experience designed to lead to a career in the federal service. Therefore, there is no provision for accelerated promotions under the Recent Graduates Program.
 - The Full Performance Level (FPL) of career ladder positions must be identified at the time of recruitment and appointment, and employees can only be promoted non-competitively up to the FPL of the approved career ladder. Competitive procedures must be used to promote an employee to a higher grade or to place an employee in a career ladder position with a higher FPL. Career Ladder promotions cannot be processed retroactively.

- Conversion to the Competitive Service.
 - A Recent Graduate may be non-competitively converted to a term or permanent appointment in the competitive service. In order to be non-competitively converted, the Recent Graduate must all of the following:
 - Be a U.S. citizen.
 - Have successfully completed all the requirements of the Recent Graduates Program as defined in the agency-participant agreement.
 - Have demonstrated successful job performance as documented by a rating of record (or summary rating) of at least Fully Successful or equivalent.
 - Be recommended for conversion by the first-level supervisor.
 - Have met the OPM qualification standard for the competitive service position to which the Recent Graduate will be converted.
 - The noncompetitive conversion of a Recent Graduate participant must be effective on or by the date the one (1) year service requirement is met, or at the end of a bureau approved extension, if applicable.
 - A Recent Graduates program participant who is noncompetitively converted to a competitive service term appointment may be subsequently converted noncompetitively to a permanent competitive service position. The conversion to a permanent appointment must be made effective prior to before the expiration date of the term appointment.
- Presidential Management Fellows (PMF) Program.
 - Qualifications, Eligibility, and Appointment
 - OPM centrally manages the PMF program, retaining responsibility for soliciting applications, rating applications, and identifying finalists under the PMF Program. All other aspects of the Department's PMF program are governed by the provisions in 5 CFR 362, Subpart D.
 - The duration of the PMF appointment in the excepted service is a trial period.

- Training and Development
 - Bureaus/Offices will provide each Fellow a minimum of 80 hours of formal interactive training per year that addresses the competencies outlined in the Individual Development Plan (IDP). Mandatory annual training, such as information security and ethics training, does not count towards the 80-hour requirement. Each Fellow must complete at least one developmental assignment of four to six months in duration, with management and/or technical responsibilities consistent with the Fellow's IDP. A Fellow may participate in an agency-wide initiative or other Presidential or Administrative initiative that provides the Fellow with the management and/or technical development identified in their IDP. The developmental assignment may be within the Fellow's organization, in another component of the agency, or in another Federal agency.
 - PMF participants are required to complete at least one developmental assignment of four to six months in duration, with in the occupation or functional discipline that the participant has been assigned, with full time management and/or technical responsibilities consistent with the participants IDP. Developmental assignments may or may not be continuous over the four to six months but must be with the same hosting organization and scope of work.
 - By regulation 5 CFR 362.405(b)(6), OPM has the authority to request that agencies make Fellows available to assist in the assessment process for subsequent PMF classes. Any interactive training provided to a Fellow in connection with assisting OPM in the assessment process may be counted toward the minimum 80-hour annual training requirement.
 - Within 90 days of appointment, each PMF will be assigned a mentor who is a managerial employee outside the PMF's chain of command. The relationship with the mentor is to provide counseling on a specific career path and for guidance on professional and educational questions. Fellows may wish to identify an individual they feel would be an appropriate mentor who possesses desired skills, knowledge, and/or perspectives, and negotiate a mentor/mentee relationship with that person.
 - Fellows must complete all program requirements during their two (2) year fellowship. Towards the end of their fellowship, the PMF must receive a decision from their agency's Executive Resources Board (ERB), or equivalent, in order to certify the Fellow has successfully completed all requirements, including the performance and developmental expectations set forth in the individual's performance plan and Individual Development Plan and Other documentation (e.g., developmental assignment evaluations, training certificates, etc.).

The suspense for an ERB to certify that a Fellow has successfully completed all program requirements is thirty (30) days prior to the Fellow two (2) year anniversary date. The ERB certification is required prior to conversion.

- Conversion to the Competitive Service.
 - A Presidential Management Fellows may be non-competitively converted to a term or permanent appointment in the competitive service. In order to be non-competitively converted, the PMF must all of the following:
 - Be a U.S. citizen.
 - Have successfully completed all the requirements of the PMF Program as defined in the agency-participant agreement.
 - Have demonstrated successful job performance as documented by a rating of record (or summary rating) of at least Fully Successful or equivalent.
 - Obtain ERB certification prior to conversion.
 - Have met the OPM qualification standard for the competitive service position to which the PMF will be converted.
 - A PMF program participant who is noncompetitively converted to a competitive service term appointment may be subsequently converted noncompetitively to a permanent competitive service position. The conversion to a permanent appointment must be made effective prior to before the expiration date of the term appointment. Conversions cannot be made retroactively.
 - A PMF may be converted within Interior or any other agency within the Federal Government. Conversion to position at a different agency is subject to 5 CFR 362.409(c).
 - When a PMF is not going to be converted, the Bureau Pathways Programs Coordinator (PPC) must notify the Department's Pathways Programs Officer (PPO) no later than 120 days prior to the end of the PMF's two (2) year anniversary. The PMF must be notified verbally no later than 90 days prior to the end of the PMF's two (2) year anniversary. The verbal notification will include an official written notification on bureau letter head.

If the reason a PMF is not going to be converted is based on misconduct and/or performance, in addition to notifying the PPC, the PPO must notify the servicing Labor/Employee Relations Office.

- Promotions
 - Any PMF who meets eligibility and OPM qualification requirements, as specified in the Department's Pathways Memorandum of Understanding (MOU) with OPM, may be promoted. Supervisors must evaluate the quality of each employee's work and level of proficiency demonstrated in the performance of assignments, document successful completion of all training requirements, and provide a recommendation for the promotion (by submitting a Request for Personnel Action or SF-52) to approve an employee's promotion to interim grade levels and to the target position if in a career ladder. A PMF will be eligible for promotion only if his or her performance is at least at the 'Fully Successful' level. There is no entitlement to a promotion.
 - The Full Performance Level (FPL) of career ladder positions must be identified at the time of recruitment and appointment, and employees can only be promoted non-competitively up to the FPL of the approved career ladder. Competitive procedures must be used to promote an employee to a higher grade that exceeds the established FPL or to place an employee in a career ladder position with a higher FPL.
 - Promotion cannot be made retroactively.
- Reappointments (Movement between Agencies/Bureaus)
 - A reappointment is when a PMF moves from one position in an agency/bureau to another during their fellowship. If the PMF moves to a position to an entirely new agency (e.g., from Interior to OPM), it is processed as a termination appointment in and transfer as long as there is no break in service. If the PMF moves to a position within the Department, but changing bureau (e.g., from Bureau of Land Management to U.S. Fish and Wildlife Service), it is processed as a reassignment. A reappointment is not a guarantee and timing is critical.
 - A PMF's fellowship consists of two (2) years of full-time, consecutive service. During a PMF's fellowship, they may reappoint to a different PMF position. Finding such reappointment opportunities are the responsibility of the PMF. The PMF Program Office and the Department discourage reappointments when the PMF can be placed within their current bureau. When a PMF and a bureau begin the fellowship period together, the bureau has and continues to invest in the PMF and their training and development with the goal to continue their growth and development in their bureau at the end of the fellowship. The PMF TMS (Talent Management System) is designed to assist Finalists in obtaining their initial appointment via appointment opportunities; the PMF TMS does not provide a means for soliciting PMF positions for reappointments. The need for a reappointment may be an option for

those bureaus unable to convert their PMF into a term or permanent position, due to budget constraints or changes in missions, reorganizations, freezes, etc., and should always be seen as a last resort before leaving the PMF Program.

- Per 5 CFR 362.409, A Fellow must complete the Program within the time limits prescribed in 362.404 of this part, including any bureau approved extension. At the conclusion of that period, the Fellow may be converted. A bureau may convert, without a break in service, an ERB-certified PMF to a competitive service term or permanent appointment in any position for which they are qualified. A PMF who is being converted to a permanent or term position at a different agency is subject to the following conditions:
 - The employing (or losing) agency must be unable to convert the PMF to a term or permanent position in the competitive service in the current organizational of the employing agency or another component within the same Department or agency. These reasons for conversion at another agency may include unforeseen budgetary constraints; reorganizations; abolishment of positions; or other appropriate reasons. Such a conversion to another agency may not be due to issues related to failure to obtain certification from the agency's Executive Resources Board, misconduct, poor performance, or suitability;
 - Conversion must occur on or before the end of the bureau prescribed Program period, plus any bureau-approved extension; and
 - The position at the new agency must have a full performance level that is equivalent to or less than the position to which the PMF would have been converted at the losing agency.
- All potential PMF reappointments must be coordinated with the Department's Pathways Programs Officer (PPO). The PPO will provide the current processes required for both the bureau and the PMF, to complete the reappointment.

18. Third-Party Provided Pathways Participant.

The Department may hire Interns provided by a third-party Intern Program into the Pathways Internship and Recent Graduate programs so long as regulatory requirements for filling positions within each program are followed. Third-party provided Pathways participants should have the same access to training, career development, and mentoring as other Pathways Programs participants within the Department. A total of 320 hours of the work performed as a third-party provided Pathways participant can be counted towards the total 480 hours required for completion of the Pathways Internship program. Upon completion of the requirements of the Pathways Internship and Recent Graduate programs, Interns from the third-party Intern Programs may be converted to a term or permanent Federal position.

19. Reporting Requirements.

- Agencies using the Pathways Programs must adhere to the annual reporting requirements in accordance with 5 CFR 362.109. Each Bureau must provide the following data:
 - Hiring projections for FY 20xx for each of the Pathways Programs. Agencies are not required to consolidate their bureaus/components' reports and can submit the data in any format.
 - Strategies and effectiveness of recruiting practices utilized to attract diverse talent using the Pathways Programs.

20. Inquiries. Any employee or employee representative seeking further information concerning this policy may contact their respective servicing human resources office. Bureau headquarters HR staff may contact the Office of Human Capital at DOI_Office_of_Human_Resources@ios.doi.gov.

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

Attachment: