

PATHWAYS FLEXIBILITIES

Resource for Pathways Programs Officers and Human Resources Professionals

There are a number of Government-wide flexibilities within the existing [Pathways regulations](#), outlined below, that can help you and your colleagues more effectively use the Pathways Programs (Programs). These strategies are intended to support you in leveraging the Programs to meet your hiring needs—they are not designed to effect any sort of regulatory changes. We encourage you to review your Pathways Memorandum of Understanding (MOU) and agency-specific policies before using any of these flexibilities.

Each of the three Programs—the Internship, Recent Graduates and Presidential Management Fellows (PMF) Programs—is referenced in this document. To learn more about the Programs, please visit the [Program Fact Sheets](#) on the Office of Personnel Management (OPM) website.

To share feedback on the strategies or spotlight your agency in the “agency example” column of this resource, please email OPM’s Recruitment Policy and Outreach Office at pathways@opm.gov.

FLEXIBILITY	PROGRAM(S) TO WHICH IT APPLIES	BENEFITS	HOW IT WORKS	SUPPORTING CITATION OR REFERENCE	AGENCY EXAMPLE	PATHWAYS-SPECIFIC (Y/N)
Agencies may:						
Conduct outreach on campuses	Internship Program Recent Graduates Program PMF Program	Target mission-critical occupations and hard-to-reach audiences Potentially enhance the diversity of the applicant pool The ability to recruit locally and/or use familiar recruiting networks	Agencies have the discretion to conduct outreach on campuses before or without posting a job opportunity announcement (JOA) on USAJOBS, provided that they are participating in informational or awareness-type events or liaison activities.	5 CFR 362.203(a) 5 CFR 362.303(a) See Final Rule, 77 Fed. Reg. 28194, 28198 6. Job Announcements OPM Pathways FAQs (#5-10)		Y

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<p>Collect applications at an on-site recruiting event (in conjunction with an announced alternative method of submission, and open period)</p>	<p>Internship Program</p> <p>Recent Graduates Program</p> <p>PMF Program (Finalists)</p>	<p>Maintain relationships with talent partners</p> <p>Target mission-critical occupations and hard-to-reach audiences</p> <p>Potentially enhance the diversity of the applicant pool</p> <p>Reduce your recruitment timeline</p>	<p>To collect applications at an on-site recruiting event for Interns and Recent Graduates, agencies should:</p> <ul style="list-style-type: none"> • Post an advertisement that publicizes the event on USAJOBS; • Make the event open to the public and part of an overall recruitment strategy; • Provide instructions on how candidates can apply if they are unable to attend the event; • Veterans' preference must be applied in accordance with governing law for all Pathways Programs. Consideration must be applied to all preference eligible first 	<p>5 CFR 362.203 OPM Pathways FAQs (#7, #9 and #10)</p>	<p>Department of Agriculture (USDA) <i>(Internship and Recent Graduates Programs)</i></p>	<p>Y</p>

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			<p>before any final selection is made; and to collect applications at an on-site recruiting event for PMF Finalists, agencies should post the event on the PMF Talent Acquisition System (TAS) and make clear that it is open to all PMF Finalists.</p>			
<p>Post an advertisement rather than a JOA</p>	<p>Internship Program Recent Graduates Program</p>	<p>Experience greater flexibility in advertising and receiving applications through means other than, or in addition to, your TAS (e.g., USA Staffing)</p> <p>Receive applications at on-site recruiting events</p> <p>By managing its Pathways job announcement and avoiding an unmanageably high number of</p>	<p>Agencies may advertise an Internship or Recent Graduate position using a JOA or by posting an advertisement on USAJOBS.</p> <p>Posting an advertisement for an Internship or Recent Graduates position is different from posting a JOA in that the “Apply Online” button is not a part of its functionality. This means that applicants</p>	<p>5 CFR 362.104(c) 5 CFR 362.105(b) 5 CFR 362.203 5 CFR 362.303</p> <p>See Final Rule, 77 Fed. Reg. 28194, 28198 6. Job Announcements OPM Pathways FAQs (#12)</p> <p>OPM Pathways Transition and Implementation Guidance (Appendix E)</p>	<p>Department of Agriculture (USDA) <i>(Internship and Recent Graduates Programs)</i></p> <p>Department of Defense (DoD) <i>(Internship Program)</i></p>	<p>Y</p>

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		<p>applications, agencies can make the rating and ranking process more manageable.</p> <p>Allow applicants to be notified of their status more quickly</p>	<p>cannot submit their applications directly through USAJOBS.</p> <p>Therefore, agencies must include instructions on where to find information to apply for the position within the body of the advertisement.</p>			
<p>Recruit students up to nine months before they complete their academic requirements</p>	<p>Internship Program</p> <p>Recent Graduates Program</p>	<p>Enhance your ability to compete with private sector and other employers for talented students and recent graduates</p> <p>Experience greater flexibility in syncing your recruitment timelines with academic calendars</p> <p>Provide applicants with a greater number of employment opportunities in Government</p>	<p>Agencies inform applicants in the JOA of how soon they may apply for the position prior to completing their academic requirements.</p> <p>The JOA should state that all qualification requirements must be met by applicants before they may enter on duty.</p> <p>Agencies using their own qualification standards for Pathways Interns may adopt similar</p>	<p>OPM Pathways FAQs (#21)</p> <p>OPM Qualification Standards (General Policies, Application of Qualification Standards, 4.d. Educational and Training Provisions or Requirements, College or University Education)</p>	<p>Department of Health and Human Services (HHS) (<i>Internship and Recent Graduates Programs</i>)</p>	<p>N</p>

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<p>Use pay flexibilities and/or incentives for Pathways positions</p>	<p>Internship Program Recent Graduates Program PMF Program (Finalists)</p>	<p>Attract and retain talented students and recent graduates Enhance your ability to compete with private sector and other employers for talented candidates</p>	<p>provisions in order to use this flexibility. Agencies determine if the use of incentives (e.g., recruitment, relocation and retention incentives; student loan repayment assistance; superior qualifications and special needs pay settings; maximum payable rate rules; etc.) is appropriate and offers them to eligible applicants.</p>	<p>5 CFR 362.105(j) 5 CFR 531.212 5 CFR part 537 5 CFR 575 (Subparts A, B and C)</p>		<p>N</p>
<p>Consider non-U.S. citizens for participation* in the Pathways Programs <i>*Pathways participants must be U.S. citizens in order to be eligible for conversion to permanent positions</i></p>	<p>Internship Program Recent Graduates Program PMF Program (Finalists)</p>	<p>Expand the pool of qualified applicants for mission-critical positions, in particular</p>	<p>Agencies may hire non-U.S. citizens under any of the Pathways Programs provided that they meet applicable immigration requirements, assuming that agency appropriations provisions do not preclude paying salary to non-citizens. Participants in the Programs must be U.S.</p>	<p>5 CFR 362.105(e) OPM Pathways Transition and Implementation Guidance (Citizenship)</p>		<p>Y</p>

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			citizens in order to be eligible for non-competitive conversion to the competitive service.			
<p>Consider competitive status candidates for participation in the Pathways Programs</p>	<p>Internship Program</p> <p>Recent Graduates Program</p> <p>PMF Program (Finalists)</p>	<p>Expand the pool of qualified applicants for available positions</p> <p>Recruit candidates with valuable Federal experience</p> <p>Develop and retain existing talent</p>	<p>Agencies may consider all eligible and qualified applicants for Pathways positions, including applicants with competitive status.</p> <p>When applicants include those with competitive status, agencies should be aware of certain considerations when appointing them (e.g., applicants must leave the competitive service in order to accept an excepted service position).</p>	<p>5 CFR 302.102(b)</p> <p>5 CFR 315.713(b)</p> <p>5 CFR 315.201(c)</p> <p>5 CFR 362.204</p> <p>5 CFR 362.205</p> <p>5 CFR 362.305</p> <p>5 CFR 362.306</p> <p>5 CFR 362.407</p> <p>5 CFR 362.408</p>	<p>Office of the Comptroller of the Currency (OCC), Department of the Treasury (<i>Internship and Recent Graduates Programs</i>)</p>	<p>Y</p>
<p>Choose whether to appoint not-to-exceed (NTE) or longer-term, indefinite Interns</p>	<p>Internship Program</p>	<p>Hire the types of Interns who will best meet your agency's needs</p>	<p>Intern NTE appointments should be used for work that is short-term, of a project-oriented nature or of similarly</p>	<p>5 CFR 362.203</p> <p>See Final Rule, 77 Fed. Reg. 28194, 28198 6. Job Announcements</p>	<p>Department of Health and Human Services (HHS)</p>	<p>Y</p>

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			<p>limited duration. Intent to convert Interns NTE should be rare, and, where invoked, the JOAs for their positions should indicate the possibility of such conversion. In order for Interns NTE who were hired without the possibility of non-competitive conversion to be converted to longer-term, indefinite Interns, they must compete for these opportunities.</p>	<p>OPM Pathways FAQs (#41-42)</p>		
<p>Establish a minimum GPA above the 2.0 requirement for Internship positions</p>	<p>Internship Program</p>	<p>Improve the quality of Intern hires</p> <p>Ensure that Interns have an incentive to maintain a strong academic record while participating in the Program</p>	<p>Agencies should review applicant data to see what impact, if any, a higher GPA would have had on applicant pools for Pathways positions.</p> <p>If no adverse effect is found on veterans who applied to and were otherwise qualified for the opportunities,</p>	<p>See Final Rule, 77 Fed. Reg. 28194, 28198 6. Job Announcements OPM Pathways FAQs (#15 and #24)</p> <p>OPM Pathways Transition and Implementation Guidance (Appendix B – Sample Internship Program Participant Agreement)</p>	<p>National Institutes of Health (NIH), Department of Health and Human Services (HHS)</p> <p>Office of the Comptroller of the Currency (OCC), Department of the Treasury</p>	<p>Y</p>

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Limit the number of days a JOA is open	Internship Program Recent Graduates Program PMF Program (Finalists)	<p>Manage its Pathways job announcement and avoid an unmanageably high number of applications, agencies can make the rating and ranking process more manageable for HR professionals by limiting the open announcement period.</p> <p>Make the review of the list of eligibles more manageable for hiring managers</p> <p>Allow applicants to be notified of their status more quickly</p>	<p>agencies may establish a GPA above the 2.0 requirement.</p> <p>Agencies must list the opening and closing dates in the JOA.</p>	<p>5 CFR 302.301</p> <p>See Final Rule, 77 Fed. Reg. 28194, 28198 6. Job Announcements OPM Pathways FAQs (#15)</p> <p>OPM Delegated Examining Operations Handbook</p>	Department of Health and Human Services (HHS) (<i>Internship, Recent Graduates and PMF Programs</i>)	N
Set a cap on the number of applications received	Internship Program Recent Graduates Program	By managing its Pathways job announcement and avoiding an unmanageably high number of applications, agencies	Agencies must include language in the JOA that states that it will close after receipt of a specified number of applications (e.g., 200 applications).	<p>5 CFR 302.301</p> <p>OPM Pathways FAQs (#15)</p> <p>OPM Delegated Examining Operations</p>	Department of Health and Human Services (HHS) (<i>Internship, Recent Graduates and PMF Programs</i>)	N

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		<p>can make the rating and ranking process more manageable for HR professionals</p> <p>OPM strongly encourages agencies to accept applications received up until 11:59 p.m. of the day the limit is reached</p> <p>Allow applicants to be notified of their status more quickly</p>		<p>Handbook (although these positions are not in the excepted service, the DEOH provides analogous guidance).</p>		
<p>Decide which qualification standards to use to hire Interns</p>	<p>Internship Program</p>	<p>Target qualified applicants</p> <p>Enhance the quality of your applicant pool</p>	<p>Agencies may establish agency-specific qualification standards or use the OPM qualification standards for the competitive service in place of the “Group Coverage Qualification Standards for Schedule D Internship Appointments.”</p>	<p>5 CFR 362.203(c)</p> <p>OPM Pathways FAQs (#29)</p> <p>Group Coverage Qualification Standards for Schedule D Internship Appointments</p>		<p>Y</p>
<p>Hire Recent Graduates above the GS-9 level (or equivalent) for</p>	<p>Recent Graduates Program</p>	<p>Enhance your ability to compete with private sector and other</p>	<p>Agencies may hire individuals at higher grades for STEM</p>	<p>5 CFR 213.3402(b)</p>	<p>National Institutes of Health (NIH), Department of Health</p>	<p>Y</p>

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<p>Pathways Science, Technology, Engineering and Mathematics (STEM) positions</p>		<p>employers for STEM talent</p> <p>Offer higher paying, higher graded positions, which may include more responsibility, to STEM talent</p>	<p>occupations (and positions involving scientific and professional research) than for non-STEM occupations (up to the GS-9 level) if they meet the position qualification requirements.</p>	<p>OPM Pathways Transition and Implementation Guidance (Recent Graduates and Appointments)</p>	<p>and Human Services (HHS)</p>	
<p>Hire PMF Finalists through the PMF STEM Track for designated occupational series and groups</p>	<p>PMF Program (Finalists)</p>	<p>Close skills gaps for mission-critical STEM occupations</p> <p>Identify and train future STEM leaders in Government</p>	<p>PMF STEM Finalists are eligible for positions designated as PMF STEM by participating Federal agencies.</p> <p>STEM positions are those advertised as STEM occupations by OPM. Agencies should work with their PMF Coordinators and HR professionals to determine if positions are STEM-eligible positions.</p> <p>Applicants may apply through OPM for either the PMF Program or the PMF</p>	<p>OPM List of PMF STEM Occupations</p>	<p>National Institutes of Health (NIH), Department of Health and Human Services (HHS)</p>	<p>Y</p>

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<p>Establish a Recent Graduates Program that lasts longer than one year</p>	<p>Recent Graduates Program</p>	<p>Align your interest in having sufficient time to evaluate candidates for conversion with candidates' interest in obtaining training and career development opportunities</p>	<p>STEM Track, but not both.</p> <p>If agencies have position-specific training programs that new hires must complete before they can perform the duties of their job, then agencies may develop a Recent Graduates Program that lasts longer than one year and up to a maximum of two years.</p> <p>Agencies wishing to use this flexibility must include a provision in their Pathways MOUs that describes the training program, including its length.</p>	<p>5 CFR 362.301</p> <p>See Final Rule, 77 Fed. Reg. 28194, 28198 6. Job Announcements</p> <p>OPM Pathways FAQs (#55)</p>	<p>Department of Defense (DoD)</p>	<p>Y</p>
<p>Modify Participant Agreements</p>	<p>Internship Program</p> <p>Recent Graduates Program</p> <p>PMF Program (Fellows)</p>	<p>Ensure that the expectations outlined in Participant Agreements best meet your agency's needs</p>	<p>Agencies have discretion to tailor Participant Agreements for each of the Pathways Programs.</p>	<p>5 CFR 362.106</p>		<p>Y</p>

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			<p>While these documents must include certain elements (e.g., general descriptions of duties and work schedules), agencies have the flexibility to incorporate additional components into them (e.g., points of contact at educational institutions).</p>			
<p>Extend the appointments for Recent Graduates and PMF Fellows by 120 days</p>	<p>Recent Graduates Program PMF Program (Fellows)</p>	<p>Retain talented participants even when they need to take extra time to address unexpected circumstances or situations</p> <p>Provide participants with the flexibility to address unexpected circumstances or situations and still meet the requirements of the Programs</p>	<p>Appointments for Recent Graduates and PMF Fellows may be extended for a period of up to 120 days under the employing agencies' procedures.</p> <p>Appointment extensions should be used to cover rare or unusual circumstances or situations. The criteria for approving appointment extensions will be identified in agencies' Pathways MOUs.</p>	<p>5 CFR 362.303 5 CFR 362.404</p>		<p>Y</p>

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<p>Waive up to 320 of the hours needed for Interns to convert to the competitive service</p>	<p>Internship Program</p>	<p>Enhance your ability to compete with private sector and other employers for talented students and recent graduates</p> <p>Recognize the knowledge, skills and abilities that students and recent graduates gained through diverse experiences</p> <p>Gain the ability to convert qualified, valuable employees more quickly and aid in their retention</p>	<p>Conversion eligibility requirements, including hours required for conversion, must be reflected in Participant Agreements.</p> <p>Interns must complete 640 hours of work in order to be eligible for conversion to the competitive service. In order to more quickly convert Interns to the competitive service, agencies may grant credit for up to 320 hours for:</p> <ul style="list-style-type: none"> • Outstanding academic achievement and exceptional job performance; • Other comparable Federal* or non-Federal (e.g., third-party) internship experience; or 	<p>5 CFR 362.204</p> <p>OPM Pathways Transition and Implementation Guidance (Student Schedules and Conversion to the Competitive Service)</p> <p>OPM Program Fact Sheets (Internship Program)</p>		<p>Y</p>

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			<ul style="list-style-type: none"> Certain active duty military or volunteer service. <p><i>*Hours spent in a previous Pathways Internship may be credited toward the hours needed for Interns to convert to the competitive service.</i></p>			
<p>Convert eligible Interns to permanent positions at any agency within 120 days of Program completion</p>	<p>Internship Program</p>	<p>Expand the pool of qualified applicants for positions at agencies across Government</p> <p>Select candidates from a pre-vetted set of students and recent graduates</p> <p>Retain talented students and recent graduates, and meet your hiring needs</p> <p>Provide Interns with greater employment</p>	<p>An Intern who has met all Program requirements may be converted to a position within her or his employing agency or any other agency within 120 days of Program completion.</p> <p>OPM and the Partnership for Public Service are developing an Intern Database that will help agencies to identify conversion-eligible Interns from across Government.</p>	<p>5 CFR 362.107(c)</p>		<p>Y</p>

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		opportunities in Government	Until this tool is released, agencies are encouraged to reach out to one another to find and connect with conversion-eligible Interns from other organizations.			
Convert Pathways participants to term appointments first and then to permanent positions later on	Internship Program Recent Graduates Program PMF Program (Fellows)	Retain Pathways participants even when permanent positions are not immediately available	<p>Agencies may convert a Pathways Intern to a term appointment—one to four years—within 120 days of Program completion.</p> <p>Agencies may also convert a Recent Graduate or PMF Fellow to a term appointment—one to four years—upon Program completion.</p> <p>Agencies may then convert the Pathways participant from the term appointment to a career or career conditional (permanent)</p>	5 CFR 362.107(b) 5 CFR 362.204(a) 5 CFR 362.305(a) 5 CFR 362.409(a) OPM Pathways FAQs (#45)		Y

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			appointment when a position or slot becomes available.			