



Angela Bailey
Associate Director for Employee Services
U.S. Office of Personnel Management, Room 6566
1900 E Street, NW.,
Washington, DC 20415-9700

Re: RIN 3206-AM34: Excepted Service, Career and Career-Conditional Employment; and Pathways Programs

I am writing on behalf of the International Public Management Association for Human Resources to express support for the Proposed Regulation: Excepted Service, Career and Career-Conditional Employment; and Pathways Programs. IPMA-HR is a professional association representing the interests of federal, state and local government human resources practitioners.

The association supports the proposal because it provides avenues for students to join the Federal workforce while pursuing their academic studies, or as the graduate, in a far more efficient and marketable manner than previous methods. The provision for conversion to trial permanent appointments for all students employed while in school is a major step forward in attracting quality students to Federal careers.

The provision that all appointees must have structured Individual Development Plans to structure their entry into, and development of, their careers in the Federal segment of public service, as well as assigned mentors is exceptionally laudable. This provision demonstrates recognition on the part of the nation's largest employer that on-boarding simply isn't enough to retain quality workers. In addition, mentoring ensures better knowledge management as institutional knowledge is passed to the workers and developing leaders who will form the organization's core strengths in the future.

We recognized the need to emphasize that student hiring represents a small portion of the overall hiring conducted within the Federal government. However, we feel student hiring clearly represents the future of the Federal workforce in many skilled occupations. For that reason we would encourage the Office of Personnel Management to more clearly define the parameters noted in reporting procedures the proposal outlines, so as to ensure Federal

agencies understand that the reporting procedures discussed are unlikely to deter any agency from fully engaging in the valuable opportunities the Pathways Program affords.

The need for skilled human resources professionals who can provide the guidance managers and supervisors will need to administer the program is evident. We would welcome the opportunity to work with you as you implement the proposed regulation.

Sincerely,

Tina Ott Chiappetta
Senior Director of Government Affairs
IPMA-HR
(703) 549-7100