



**Summary/analysis of
Pathways Programs final regulations**
May 2012

The final regulations have few substantial changes from the proposed regulations, but there are some that will affect students and graduates of public affairs schools. Overall, the final version remains highly supportive of students and recent alumni: graduate students are still eligible for all 3 programs (Internship, Recent Graduates, PMF), and the program sizes remain uncapped. [NASPAA's comment letter was cited four times, including directly quoting our referring to the draft as "a rigorous and accountable framework".]

The final regulations will go into effect July 10, 2012.

Biggest changes:

- **Recent Graduates positions will be only one year rather than two**, except for positions that include a "structured training program" preceding the year of service.
- To make up for the delay in the issuance, and in recognition of the "class of 2011 dilemma" (eligible for neither FCIP nor Pathways), **anyone who "completed their educational program requirements" after the Executive Order was issued on Dec. 27, 2010 will be grandfathered** and have a full two years of Recent Grads eligibility, through July 2014.
- The regs clarify that only *current* students are eligible for the Internship program. All hours to be credited for conversion must be completed "while a student". The regulations imply that eligibility ends on the date of completion of degree requirements.
- While the program sizes remain uncapped, the regulations now allows for a possible future cap on both the number of participants and conversions, as part of OPM's oversight, but enumerate a list of criteria OPM would have to consider before doing so.
- A minimum program length of one year was set for "certificate" programs.
- Agencies will have six months (until January 2013) to transition current STEP and SCEP interns to the new Internship program.

Unchanged:

- **Recent Graduates positions are still capped at the GS-9 level**, to keep the program "entry level" and "focused on individuals without prior work experience in their chosen field".
- Interns can be hired at any pay grade. Agencies are still allowed to 'hire' student "volunteers"; volunteer service may be credited for possible conversion.
- Conversion to permanent federal service or a tern position remains at the agency's discretion.
- Eligibility still includes students "accepted", not solely those enrolled.