

National Archives and Records Administration

Transmittal Memo

EFFECTIVE DATE: February 20, 2018

DATE: March 4, 2014

TO: Executives, Staff Directors, NHPRC, and OIG

SUBJECT: NARA 310, NARA Pathways Programs

Purpose: This memo transmits a new directive establishing NARA's policy and procedures for implementing the government-wide Pathways Programs.

Background/significant changes: The Pathways Programs consist of three excepted service programs tailored to recruit, hire, develop, and retain students and recent graduates: (1) Internship Program; (2) Recent Graduates Program; and (3) Presidential Management Fellows (PMF) Program. NARA will not be participating in the PMF Program at this time.

Available forms:

- NA Form 3073, Internship Program Participant Agreement
- NA Form 3074, Recent Graduates Program Participant Agreement

Canceled policy: Interim Guidance 310-1, NARA Internship Program, issued July 10, 2012.

Effective date: This directive is effective upon signature.

Contact information: Questions on the Pathways Programs may be addressed to your servicing staffing specialist in the Talent Management Division, Staffing and Classification Branch (HTS).

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Deputy Archivist of the United States

National Archives and Records Administration

NARA 310
March 4, 2014

SUBJECT: NARA 310, NARA Pathways Programs

PART 1 – GENERAL

310.1 What is the purpose of this directive?

This directive establishes NARA's plan for implementing the Internship Program and Recent Graduates Program of the government-wide Pathways Programs.

310.2 What are the Pathways Programs?

The Pathways Programs consist of three excepted service programs tailored to recruit, hire, develop, and retain students and recent graduates: (1) Internship Program; (2) Recent Graduates Program; and (3) Presidential Management Fellows Program (PMF). NARA will not be participating in the PMF Program at this time.

310.3 What is the Internship Program?

- a. The Internship Program is a streamlined program which replaces the Student Career Experience Program (SCEP) and Student Temporary Employment Program (STEP). This program is designed to provide current students enrolled in a variety of educational institutions with paid opportunities to work in agencies and explore Federal careers while in school. This program exposes students to jobs in the Federal civil service by providing meaningful development work at the beginning of their careers, before their career paths are fully established. Students hired under this program are referred to as Interns.
- b. The program provides agencies with the opportunity to convert interns who successfully complete the program and academic requirements to any competitive service position for which the intern is qualified. However, conversion is not mandatory or guaranteed.
- c. The flexible nature of the program also accommodates the need to hire students to complete temporary work or projects, perform labor-intensive tasks not requiring subject matter expertise, or to work traditional "summer jobs." Interns hired to perform such work on temporary appointments are not eligible for conversion to permanent positions in the competitive service.

310.4 What is the Recent Graduates Program?

- a. The Recent Graduates Program is a new program that provides employment opportunities for recent graduates and individuals who have obtained degrees/certificates from qualified educational institutions or programs. Applicants must apply within 2 years of completing their educational programs (except for veterans precluded from applying due to their military service obligation). Individuals hired under this program are referred to as Recent Graduates.
- b. The program provides agencies an opportunity to place recent graduates in a 1-year career development program, enabling individuals who lack experience to explore Federal employment at the beginning of their careers. NARA's expectation is to noncompetitively convert participants who successfully complete the program to

permanent appointments (or term appointments in limited circumstances) in the competitive service.

- c. This program should only be used as a recruitment strategy when program offices have approval to fill a position on a permanent basis. (See subpar. 310.51(a).

310.5 What is the difference between the Internship Program and the Recent Graduates Program?

The Internship Program is for students currently enrolled in a degree/certificate seeking program. The Recent Graduates Program is for individuals who have completed the program requirements for an associates, bachelors, masters, professional, doctoral or technical/vocational degree or certificate.

310.6 May a relative of a NARA employee participate in the Pathways Programs?

Yes, provided there is no direct reporting relationship and the NARA employee is not in a position to advocate the appointment, employment, promotion, or advancement of the Pathways participant.

310.7 What is the scope of this directive?

This directive provides guidance on:

- a. Internship Program (see part 2);
- b. Recent Graduates Program (see part 3);
- c. Recruitment, Selection and Placement (see part 4)
- d. Pay, Benefits, and Leave (see part 5);
- e. Managing Performance (see part 6); and
- f. Records Management (see part 7).

310.8 What are the authorities for this directive?

- a. E.O. 13562 (December 27, 2010), Recruiting and Hiring Students and Recent Graduates.
- b. 5 CFR § 213.3402, Entire Executive Civil Service; Pathways Programs.
- c. 5 CFR Part 302, Employment in the Excepted Service.
- d. 5 CFR Part 315, Career and Career-Conditional Employment.
- e. 5 CFR Part 362, Pathways Programs.

310.9 Applicability.

This directive does not cover employment of volunteers or unpaid interns. Procedures for hiring volunteers are described in NARA 1606, Volunteer Programs. Procedures for hiring unpaid interns are described in NARA 312, Unpaid Student Interns.

310.10 Definitions.

For purposes of this directive, the following definitions apply:

- a. **Break in program** – a period of time when an intern is working but unable to go to school, or is neither attending classes nor working.
- b. **Break in service** – the time when an employee is no longer on NARA's payroll.
- c. **Career appointment** – a permanent appointment in the competitive service given to an employee who has completed three years of substantially continuous Federal service.

- d. **Career-conditional appointment** – a permanent appointment in the competitive service given to an employee who has less than three years of substantially continuous Federal service.
- e. **Certificate program** – post-secondary education, in a qualifying educational institution, equivalent to at least one academic year of full time study that is part of an accredited college-level, technical, trade, vocational, or business school curriculum.
- f. **Change in hours** – a change in the total number of hours that a part-time employee is scheduled to work.
- g. **Change in work schedule** – a change in the time basis on which an employee is paid. A work schedule may be full time, part-time, or intermittent. (Note: Interns and recent graduates may not be placed on an intermittent work schedule.)
- h. **Competitive service** – all civilian positions in the Federal Government that are not specifically excepted from civil service laws by statute, Executive order, or Office of Personnel Management (OPM) regulations, and that are not in the Senior Executive Service.
- i. **Excepted appointment** – a permanent appointment in the excepted service.
- j. **Excepted appointment not-to-exceed (NTE)** – a temporary appointment in the excepted service.
- k. **Excepted service** – all civilian positions in the Federal Government that are excepted from the requirements of the competitive service by statute, Executive order, or OPM regulations, and that are not in the Senior Executive Service.
- l. **Intern** – a student hired under the Internship Program.
- m. **Participant Agreement** – a written agreement between NARA and each Pathways employee.
- n. **Pathways employee** – any individual appointed under a Pathways Program.
- o. **Pathways Programs Officer (PPO)** – individual responsible for administering NARA's Pathways Programs and serving as liaison with OPM.
- p. **Qualifying educational institution** –
 - i. A public high school whose curriculum has been approved by a State or local governing body, a private school that provides secondary education as determined under State law, or a homeschool that is allowed to operate in a State; and
 - ii. Any of the following educational institutions or curricula that have been accredited by an accrediting body recognized by the Secretary of the U.S. Department of Education:
 - 1. Technical or vocational school;
 - 2. 2-year or 4-year college or university;
 - 3. Graduate or professional school (e.g., law or medical school); or
 - 4. Post-secondary homeschool curriculum.
- q. **Student** – an individual accepted for enrollment or enrolled and seeking a degree (diploma, certificate, etc.) in a qualifying educational institution, on a full or half-time basis (as defined by the institution in which the student is enrolled), including awardees of the Harry S. Truman Foundation Scholarship Program under Public Law 93-842.
- r. **Recent Graduate** – an individual hired under the Recent Graduates Program.
- s. **Temporary appointment** – an excepted service appointment limited to 1 year or less.

- t. **Term appointment** – a competitive service appointment that will last more than one year but not more than four years to perform work on a project.

310.11 Responsibilities.

- a. **Chief Human Capital Officer (H)** - NARA official responsible for entering into a Memorandum of Understanding (MOU) with OPM for the administration of the Pathways Programs.
- b. **Director, Talent Management Division (HT)**
 - i. Designates NARA's Pathways Programs Officer (required);
 - ii. Ensures agency-wide compliance with all applicable regulations and policies;
 - iii. Approves waivers of up to one-half (i.e., 320 hours) of the 640-hour service requirement for conversion of interns to permanent or term appointments (see par. 310.35);
 - iv. Approves extensions of recent graduate appointments for up to 120 calendar days to cover rare or unusual circumstances (see par. 310.46); and
 - v. Reports to OPM on NARA's implementation of the Pathways Programs and individuals hired under these Programs.
- c. **Pathways Programs Officer (PPO)**
 - i. Administers NARA's Pathways Programs, including coordinating the recruitment and on-boarding process for Pathways Programs employees;
 - ii. Ensures mentors are assigned and Individual Development Plans (IDPs) are in place for recent graduates;
 - iii. Approves "breaks in program" under the Internship Program (see par. 310.26 and 310.27); and
 - iv. Serves as liaison with OPM by providing updates on NARA's implementation of the Pathways Programs, clarifying technical and programmatic issues, sharing best practices and lessons learned, and preparing required reports, including annual estimated projected use of the Pathways Programs and actual Program usage for the previous year. (required)
- d. **Staffing and Classification Branch (HTS)**
 - i. Advises supervisors on the requirements of the Pathways Programs;
 - ii. Ensures adherence to the requirements for accepting applications, assessing applicants, rating and ranking qualified candidates, and affording veterans' preference in accordance with the provisions of 5 CFR Part 302, Employment in the Excepted Service;
 - iii. Provides OPM with information about Pathways opportunities for posting on the Internet (required); and
 - iv. Processes all personnel actions and maintains necessary records.
- e. **Performance Management Program Manager**
 - i. Consults with and advises supervisors on the development of performance plans;
 - ii. Provides guidance to supervisors on performance issues; and
 - iii. Provides guidance to supervisors on the Incentive Awards Program.
- f. **Labor/Employee Relations and Benefits Branch (HTL)**
 - i. Provides guidance to supervisors on conduct issues; and

- ii. Assists supervisors in taking action to remove interns and recent graduates from their positions, if necessary.
- g. **Human Capital Planning and Accountability Staff (H-PA)**
 - i. Assists Program Offices in forecasting the need for students and recent graduates, to be hired through the Pathways Programs, as part of an overall workforce planning strategy;
 - ii. Ensures, as appropriate, the use of the Pathways Programs to close staffing and competency gaps; and
 - iii. Provides hiring projections to the PPO for inclusion in the annual Pathways Programs report to OPM.
- h. **Director, Learning and Development Division (HL)**
 - i. Consults with and advises supervisors on the development of IDPs;
 - ii. Provides guidance to supervisors on how to select mentors and develop effective mentoring relationships; and
 - iii. Provides ongoing training and development support to Pathways employees as needed.
- i. **Program Offices** – in consultation with H-PA, identify positions that may appropriately be filled using the Pathways Programs.
- j. **Supervisors**
 - i. Inform Pathways employees of expectations, including developmental assignments and performance requirements by initiating the Pathways Program Participant Agreement with each intern and recent graduate;
 - ii. Orient Pathways employees to NARA's mission and policies, and to the specific requirements of the unit to which the employee is assigned;
 - iii. Assist Pathways employees (in particular recent graduates) with the selection of a mentor;
 - iv. Conduct regular performance assessments and periodic coaching and counseling discussions with Pathways employees;
 - v. Provide formal and on-the-job training as required;
 - vi. Verify interns' educational status as provided in par. 310.22; and
 - vii. Adhere to the supervisory provisions of the Pathways Participant Agreement and the policies and procedures outlined in this directive.
- k. **Mentors** – Provide personal assistance and guidance to Pathways employees on issues such as career development, personal growth, organizational culture, and networking.
- l. **Pathways Employees**
 - i. Assume responsibility for and actively participate in their individual and career development activities;
 - ii. Complete assignments as outlined in training plans and Individual Development Plans (IDPs);
 - iii. Provide documentation of continued enrollment as a student as provided in par. 310.22 (interns only); and
 - iv. Adhere to the provisions of the Participant Agreement and policies and procedures outlined in this directive.

310.12 Program Accountability and Oversight.

- a. NARA's MOU with OPM implementing the Pathways Programs must be renewed at least every 2 years.
- b. The Director, OPM has the authority to establish caps on the number of Pathways employees who may be appointed or converted in any Pathways Program within NARA or throughout the Federal Government.

PART 2 – INTERNSHIP PROGRAM

310.13 What are the eligibility requirements of the Internship Program?

- a. **Enrollment** - The student must be accepted for enrollment or enrolled and seeking a degree (diploma, certificate, etc.) in a qualifying educational institution on a full or half time-basis (defined by the institution in which enrolled), be in good academic standing as determined by the educational institution (i.e., not on academic probation), and progressing toward completion of educational requirements.
- b. **Qualifications** –
 - i. The student must meet the OPM qualification requirements for the position being filled.
 - ii. The duties of the position should be related to either the student's academic or career goals.
 - iii. Students being considered for positions that have positive education requirements (e.g. archivist, accountant) must be enrolled in a directly related degree program in order to be eligible for conversion to that position in the competitive service.
 - iv. Some positions may include specific fitness requirements, which must be verified upon selection.
- c. **Age** - The student must be at least 16 years old.
- d. **Citizenship** - The student must be a U.S. citizen or national (resident of American Samoa or Swain's Island).
- e. **Suitability** - The student must meet suitability requirements. A national agency check or background investigation, as appropriate, will be conducted upon appointment.

310.14 Is a student pursuing a General Education Development (GED) equivalency certificate eligible for the Internship Program?

Yes, a student enrolled in GED courses and pursuing a GED diploma meets the definition of "student" provided the student is attending a qualifying educational institution.

310.15 May NARA appoint students who are home-schooled to the Internship Program?

Yes, provided they are otherwise eligible (see par. 310.13), home-schooled students may participate in the Internship Program as long as they are participating in either 1) an accredited home-school, or 2) a home-school curriculum approved by their State or local governing jurisdiction.

310.16 What positions may be filled under the Internship Program?

There is no grade level limit on positions that may be filled under the Internship Program; however, the student must meet the qualification requirements for the position. Interns whose positions are under the General Schedule (GS) pay plan must be classified as student trainees, in the xx99 series of the appropriate occupational group. Interns whose positions are under the Federal Wage System (FWS) will be classified as student trainees, in the xx01 series of the appropriate occupational group.

310.17 What is the duration of an appointment under the Internship Program?

Interns may be appointed:

- a. On an appointment without time limit but for an initial period expected to last more than 1 year. An end date must be specified in the participant agreement with the intern and is generally 120 days after the intern's projected graduation date.
- b. On a temporary basis not to exceed (NTE) one year, the ending date of which must be specified in the participant agreement with the intern. Temporary appointments may be extended in 1-year increments as long as the intern continues as a student and meets program eligibility requirements. If an intern becomes ineligible before the expiration date of his or her appointment, a personnel action request must be initiated in the Federal Personnel and Payroll System (FPPS) by the supervisor to terminate the intern's appointment. Supervisors should consult HTL prior to initiating the termination action in FPPS.

310.18 What are the training and development requirements for the Internship Program?

- a. Interns hired without time limit with the intent to convert to permanent employment upon completion of educational and work requirements must have an approved Individual Development Plan (IDP) within 45 days of appointment.
- b. Interns hired for short-term temporary work, labor intensive work, and summer jobs are exempt from IDP requirements.

310.19 When does an intern's appointment expire?

As a condition of employment, an intern appointment expires as follows:

- a. For interns appointed without time limit, the appointment expires 120 days after completion of the intern's academic course of study, unless the intern is selected for noncompetitive conversion as described in pars. 310.30 - 310.31.
- b. For interns appointed on a temporary basis, the appointment expires on NTE date of the intern's appointment, unless the appointment is extended as described in par. 310.17b.
- c. For all interns, expiration dates should be clearly stated in the Participant Agreement.

310.20 How many times can a student be appointed to the Internship Program?

There is no limit on the number of times a student may be appointed as long as he or she meets the eligibility requirements for the appointment.

310.21 May students appointed under the Internship Program remain in the program once they have completed their educational requirements (i.e., they are no longer students)?

- a. Temporary interns who have completed their educational requirements may not remain in the Program as they are no longer students and, therefore, do not meet the eligibility requirements for the Program. Supervisors who become aware that an employee no longer meets the definition of student must submit a personnel action request in FPPS to separate the employee, even if the NTE date on his or her current appointment has not been reached.
- b. Interns appointed without time limit may remain in the program up to 120 days after graduation, during which time eligible interns may be converted to permanent or term employment in accordance with par. 310.33.

310.22 Are supervisors required to verify an intern's educational status throughout his or her employment?

Yes, supervisors are responsible for verifying an intern's educational status as follows:

- a. At least annually, interns must submit an official transcript to their supervisor.
 - i. For nontemporary interns, official transcripts must be provided to the PPO on the anniversary date of the intern's appointment. A copy should be maintained in the intern's unofficial personnel folder.
 - ii. For temporary interns, an official transcript must be provided to the PPO at least 2 weeks prior to the not-to-exceed (NTE) date of the intern's appointment. A copy should be maintained in the intern's unofficial personnel file.
 - iii. Official transcripts may also be emailed from the registrar's office directly to Pathways@nara.gov.
- b. In addition to the annual requirement, an intern may be required to submit an official transcript at any time at the supervisor's request. The request should be in writing (with a copy to the PPO) and provide the intern with adequate notice (e.g., 2 weeks) to provide the official transcript.
- c. At the beginning of each semester or quarter, the supervisor must verify that the intern continues to be enrolled on at least a half-time basis in a degree/diploma/certificate program. Acceptable forms of verification include:
 - i. an official letter from the educational institution stating the intern is enrolled on at least a half-time basis. The letter should state the degree, diploma, or certificate program in which the intern is enrolled; or
 - ii. a recent official transcript that shows the intern is enrolled in the current semester or quarter on at least a half-time basis.
- d. At the end of each semester or quarter (or as soon as information is available), the supervisor must verify that the intern was properly enrolled during the previous semester, is in good academic standard, and is making progress toward completion of his or her educational program. Acceptable forms of verification include:
 - i. a formal grade report that includes the name of the educational institution, courses completed, hours granted, final grades, grade point average, and cumulative grade point average; or

- ii. a recent official transcript.
- e. The above documentation should be submitted to the PPO. Copies should be maintained in the intern's unofficial personnel file.

310.23 What work schedules may interns work?

Interns may work a full time or part-time schedule. The supervisor and intern should agree on a formally-arranged schedule of work so that work responsibilities do not interfere with the academic schedule, and completion of the educational program and the Internship Program are accomplished in a reasonable and appropriate timeframe. Final decision regarding work schedules shall be made at the discretion of the supervisor.

310.24 What are the limitations of a part-time work schedule?

- a. Interns on temporary appointments may work from 1 to 32 hours per week.
- b. Interns without time limit are covered by the Federal Employees Part-Time Career Employment Act of 1978 and may work from 16 to 32 hours per week.

310.25 May interns be placed on intermittent work schedules?

No. It is not the intent of the Internship Program to have interns work in positions in which the work is so sporadic and unpredictable that the work cannot be scheduled in advance. An intermittent work schedule is not conducive for students with a set academic schedule or for Intern appointments intended to train an employee for permanent employment.

310.26 Must interns work or attend school during the summer?

The intent of the program is that interns are always attending classes, working or both. However, the PPO may permit a "break in program" during which the intern is neither attending classes nor working. The intern is placed on leave without pay (LWOP) during this "break" time. See par. 310.28.

310.27 Are there any limits on the length of a "break in program"?

- a. Supervisors should ensure that the intern is making reasonable progress toward the attainment of the degree/diploma, etc. and that the needs of the organization are considered. A break in program should not exceed one academic semester or quarter, or the "summer" (not to exceed 90 days). See par. 310.28.
- b. An intern is generally allowed only one break in program (other than "summer" breaks) during his or her appointment. Subject to PPO approval, a nontemporary intern may be allowed an additional break-in-program in the event of an unforeseen emergency (e.g., medical condition, natural disaster).
- c. All breaks in program regardless of how long they will last are subject to PPO approval.

310.28 How should supervisors handle periods when an intern is unavailable for work?

- a. Interns may request LWOP for periods when they are unavailable for work. LWOP is approved at management's discretion but only if the intern is expected to return to duty within 90 days. LWOP for more than 90 days must be approved by PPO. LWOP is normally requested and approved on an SF 71, Request for Leave or Approved Absence.

- b. A period of LWOP for more than 30 calendar days requires submission of a personnel action request in FPPS. The request must show the effective date as the first full day of the continuous period of LWOP.

310.29 What is the process for submitting changes in work schedules and hours?

Supervisors must submit a personnel action request to HTS in FPPS to document -

- a. A change in work schedule (from full time to part-time or part-time to full time) for more than one pay period; or
- b. A change in the total number of hours worked by a part-time intern if the change is to continue for more than two pay periods.

The FPPS action must be received in HTS at least one full pay period prior to the proposed effective date of the change.

310.30 May Internships lead to permanent employment with NARA?

- a. Yes. Interns hired without time limit may be noncompetitively converted to a term or permanent position in the competitive service when all program requirements are met, provided a sufficient number of permanent positions have been set aside during NARA's workforce planning process. Interns converted to term appointments may be subsequently converted noncompetitively into permanent competitive service positions before the term appointment expires. However, conversion is not mandatory or guaranteed. Participation in the Internship Program confers no right to further employment in the competitive or excepted service.
- b. Under NARA policy, interns hired on temporary appointments (i.e. with time limits) are not eligible for noncompetitive conversion to term or permanent positions in the competitive service. However, they may subsequently compete for internship positions (without time limit) that offer conversion to term or permanent positions through the vacancy announcement process.

310.31 What is NARA's policy on converting nontemporary interns to permanent or term positions in the competitive service?

The intent of the Internship Program is to provide a pipeline of well-trained employees for entry into the Federal workforce. Although not mandatory, it is NARA's expectation that supervisors will convert nontemporary interns to permanent appointments (or term appointments in limited circumstances) in the occupation for which they were trained provided they have completed all program requirements and meet qualifications, suitability, and performance requirements (see par. 310.33). Interns who do not meet eligibility requirements for noncompetitive conversion or are not converted for other reasons (such as budget/FTE limitations or performance) must be terminated from the program.

310.32 Under what circumstances could conversion of a nontemporary intern to a term appointment be appropriate?

The intent behind allowing agencies to convert interns to term appointments is to cover those instances where budgets and other workforce requirements preclude an agency from converting an individual to a permanent position. As stated in par. 310.30a, program offices should make every effort to ensure that a sufficient number of permanent positions are available for

conversion of interns through the workforce planning process. However, a term appointment may be considered as a “last resort” option to, in good faith, fulfill obligations for conversion to a permanent appointment at a later date. Supervisors wishing to exercise this option must submit a justification, which includes a plan for ultimate conversion to a permanent position, to HTS through their Executive/Staff Director.

310.33 What are the requirements for noncompetitive conversion to a term or permanent appointment in the competitive service?

The Intern must:

- a. Be employed on an Internship appointment without time limit;
- b. Complete at least 640 hours of work experience acquired through the Internship Program, while enrolled as a full time or part-time, degree- or certificate-seeking student;
- c. Complete, within the preceding 120 days, a course of academic study conferring a diploma, certificate or degree from a qualifying educational institution
- d. Be recommended by their manager or supervisor. See subpar. 310.40(c);
- e. Meet the OPM qualification standards for the position to which the intern will be converted; and
- f. Meet agency requirements for conversion as specified in NA Form 3073, Internship Program Participant Agreement.

310.34 May NARA credit other job-related experience toward the 640 work hours required for conversion?

Yes. Up to 320 hours acquired through a comparable non-Federal internship experience or active duty military service may be credited toward the 640-hour service requirement. The work experience must be in a field or functional area related to the intern’s target position and acquired while the intern:

- a. Worked in, but not for, a Federal agency under a formal internship agreement, comparable to the Pathways Internship Program (e.g., fellowships and similar programs), between a Federal agency and an accredited academic institution, to include student volunteers as defined by 5 CFR Part 308;
- b. Worked in, but not for, a Federal agency under a written contract with a third-party internship provider officially established to provide internship experiences to students that are comparable to the Pathways Internship Program; or
- c. Served as an active duty member of the armed forces of the United States (including the National Guard and Reserves) and has been discharged or released from active duty in the armed forces under honorable conditions.

310.35 May NARA waive any of the 640 work hours required for conversion?

Upon approval of the Director, HT, up to one-half (i.e., 320 hours) of the 640-hour service requirement may be waived if

- a. the intern completes 320 hours of career-related work experience under an Internship Program appointment; and
- b. demonstrates high potential, as evidenced by outstanding academic achievement and exceptional job performance.

310.36 Are there any circumstances under which NARA may waive or credit more than 320 hours of career-related work experience?

No. Agencies may only waive or credit up to a total of 320 hours toward the required 640 hours of career-related work experience.

310.37 What is meant by “outstanding academic achievement”?

Outstanding academic achievement must be demonstrated by

- a. an overall grade point average of 3.5 or better, on a 4.0 scale;
- b. standing in the top 10 percent of the student’s graduating class; or
- c. induction into a nationally-recognized scholastic honor society.

310.38 How is exceptional job performance determined?

Exceptional job performance must be demonstrated by a formal evaluation conducted by the intern’s supervisor which results in a rating of highly successful or higher.

310.39 May supervisors evaluate an intern’s performance for purposes of determining his or her eligibility for conversion if the intern has not served the minimum 90-day period under NARA’s performance appraisal system?

Yes. For purposes of determining eligibility for noncompetitive conversion, supervisors may evaluate an intern’s performance based on 320 hours of service under an Internship appointment.

310.40 What documentation is required to convert an intern to a permanent or term position in the competitive service?

Supervisors must submit a personnel action request in FPPS, along with the following documents, to HTS within the 120 day window following completion of the intern’s academic program.

- a. The classified position description to which the intern is to be converted;
- b. Verification that the intern has completed his or her academic program (i.e., final transcript showing degree/diploma granted, a letter from the educational institution that program requirements for intern’s degree/diploma/certificate have been met, etc.); and
- c. A statement from the supervisor recommending the intern’s conversion and certifying that the intern has performed at a satisfactory level of competence during the program and has fulfilled all program requirements as outlined in the Internship Program Participant Agreement. This information should be included in the “notes” section of the FPPS personnel action request.

The FPPS action and above documentation must be received in HTS at least one full pay period prior to the proposed effective date of the action.

PART 3 - RECENT GRADUATES PROGRAM

310.41 What are the eligibility requirements of the Recent Graduates Program?

- a. Recent Graduate – The individual must have graduated no more than 2 years prior with an associates, bachelors, masters, professional, doctoral, or technical/vocational degree or

certificate from an qualifying educational institution (except for veterans precluded from applying due to their military service obligation – see par. 310.43).

- b. Qualifications - The individual must meet the OPM qualification requirements for the position being filled. Some positions may include specific fitness requirements, which must be verified upon selection.
- c. Citizenship - The individual must be a U.S. citizen or national (resident of American Samoa or Swain's Island).
- d. Suitability - The individual must meet suitability requirements. A national agency check or background investigation, as appropriate, will be conducted upon appointment.

310.42 Are recent high school graduates and GED recipients eligible to participate in the Recent Graduates Program?

No. See par. 310.41 for eligibility requirements.

310.43 Are there exceptions to the 2-year eligibility period?

- a. Yes. Preference eligible veterans who were precluded from applying due to their military service obligation begin their 2-year eligibility period upon release or discharge from active duty. Eligibility for a veteran in this case cannot exceed 6 years from the date on which the veteran completed his or her degree (or certification).
- b. Any individual who completed his or her educational requirements between December 27, 2010, and the effective date of the final Pathways regulation (July 10, 2012) will have 2 years from the effective date of the regulation to apply to the Recent Graduates Program.

310.44 What positions are appropriate for filling through the Recent Graduates Program?

- a. Positions that require technical skills and/or knowledge that could be attained through a degree and could be filled at an entry level with little or no experience are appropriate for the Recent Graduates Program. Positions must provide career advancement opportunities (i.e., they must be career ladder positions). Appointments may not be made at the full performance level of the position.
- b. Initial appointments may be made up to the GS-9 level. Recent graduates with degrees in the STEM fields (science, technology, engineering or math) may be appointed at the GS-11 level if they possess a Ph.D. or equivalent degree from a qualifying institution directly related to the position being filled.

310.45 What is the duration of a Recent Graduate appointment?

The Recent Graduates Program is a 1-year career development program. As a condition of employment, a Recent Graduate appointment expires at the end of the 1-year period, plus any NARA approved extension if applicable, unless the employee is selected for noncompetitive conversion to a permanent or term position as provided in par. 310.49.

310.46 Can Recent Graduate appointments be extended beyond 1 year?

- a. The Director, HT may approve extensions of recent graduates' appointments of up to 120 calendar days to cover rare or unusual circumstances (e.g., an extended illness that delayed completion of program requirements).

- b. Requests for extension must be submitted by program offices to the Director, HT at least 30 calendar days before the end of the 1-year period.

310.47 What are the training and development requirements for the Recent Graduates Program?

- a. Individual Development Plan (IDP) – Within 45 days of appointment, each recent graduate must have an approved IDP to create and track the employee’s career planning, professional development, and training activities.
- b. Formal training – Each recent graduate must be provided at least 40 hours of formal interactive training per year that advances the goals and competencies outlined in the employee’s IDP. Training should be designed to enhance the employee’s technical proficiency, leadership skills, and advancement potential.
- c. Mentor - Within 90 days of appointment, each recent graduate must be assigned a mentor to discuss career related issues and questions. The mentor should work within the same program office, but be outside the career intern’s immediate chain of command. HL is available to assist program offices in designating mentors and developing effective mentoring relationships.

310.48 What happens at the end of the 1-year period if the recent graduate completes the program successfully?

Upon successful completion, if the recent graduate meets all qualifications, suitability, and performance requirements, he or she may be converted noncompetitively to a permanent or term position in the competitive service.

310.49 What are the requirements for noncompetitive conversion to a permanent or term position in the competitive service?

The recent graduate must:

- a. Successfully complete at least 1 year of continuous service in addition to all requirements of the Program (as outlined in the Participant Agreement);
- b. Demonstrate successful job performance; and
- c. Meet the OPM qualification standard for the position to which the recent graduate will be converted.

310.50 Are program offices required to convert recent graduates to permanent or term positions?

The intent of the Recent Graduates Program is to place employees in permanent positions upon completion of the program. NARA expects program offices to convert recent graduates to permanent (or term, in limited circumstances) appointments in the occupation for which they were trained, if the recent graduate has completed all program requirements and meets qualifications, suitability, and performance requirements. If a program office determines that it is unable to convert a recent graduate for any reason, the program office must notify the PPO as soon as possible to explore options and alternatives.

310.51 Under what circumstances could conversion of a recent graduate to a term appointment be appropriate?

- a. The intent behind allowing agencies to convert recent graduates to term appointments is to cover those instances where budgets and other workforce requirements preclude an agency from converting the employee to a permanent position. The Recent Graduates Program is a 1-year program. As such, program offices should only entertain use of this program as a recruitment strategy if they have approval to fill a position on a permanent basis.
- b. Conversion to a term appointment may only be considered as a “last resort” option to, in good faith, fulfill obligations for conversion to a permanent appointment at a later date. Supervisors wishing to exercise this option must submit a justification, which includes a plan for ultimate conversion to a permanent position, to HTS through their Executive/Staff Director.

310.52 When is this non-competitive conversion effective?

Conversion must take place immediately upon completion of the 1-year program. There can be no break in service between the initial appointment and the noncompetitive conversion. The conversion is effective on the date the 1-year service requirement is met, or at the end of the extended period, as applicable.

310.53 What documentation is required to convert a recent graduate to a permanent or term position in the competitive service?

Supervisors must submit a personnel action request in FPPS, along with the following documents, to HTS at least 30 days prior to completion of the 1-year appointment.

- a. The classified position description to which the employee is to be converted; and
- b. A letter recommending the employee’s conversion and certifying that the employee has performed at a satisfactory level of competence during the program and has fulfilled all training requirements as outlined in the employee’s IDP.

310.54 What happens if a recent graduate withdraws from the Program?

Program offices must notify the PPO after discovering that a recent graduate may withdraw from the Program. A recent graduate:

- a. Appointed from outside the Federal service must submit a resignation. The employee’s separation is processed as a voluntary resignation.
- b. Who held a career or career-conditional appointment in NARA immediately before entering the Program, and fails to complete the Program for reasons not related to misconduct, poor performance, or suitability, may, at NARA’s discretion, be placed in a permanent competitive service position in NARA at no higher grade level than the employee held prior to the recent graduate appointment.
- c. Who held a career or career-conditional appointment in another agency immediately before the excepted service appointment as a recent graduate must submit a resignation. The employee’s separation is processed as a voluntary resignation. Such employees have no right to return to a career or career conditional appointment within NARA.

310.55 Does the Recent Graduates Program allow for movement of recent graduates between Federal agencies?

Yes. Participants in the Recent Graduates Program may apply for and accept a new Recent Graduates appointment with another Federal agency. To move to a new appointment, the employee must separate from the current appointment and be appointed to the new one without a break in service. Time spent under the initial appointment counts towards meeting the Program requirements for noncompetitive conversion eligibility to the competitive service. The employee does not begin a new Program period. The new agency must enter into a new Participant Agreement with the employee.

PART 4 – RECRUITMENT, SELECTION AND PLACEMENT

310.56 Why should supervisors use the Pathways Programs to fill positions?

There is a continuing need to recruit and develop talented employees to support changing agency missions; fill competency gaps; ensure that the Federal Government can meet its professional, technical, and administrative needs; and sustain a quality and diverse workforce. NARA's workforce planning strategy includes utilization of the Pathways Programs as one strategy to help address these challenges.

310.57 What is required to start the recruitment process for hiring an Intern or Recent Graduate under the Pathways Program?

The hiring manager must submit a Request for Eligibles in the Workforce Transformation and Tracking System (WTTS), along with the position description, to HTS.

310.58 How are applicants recruited for positions under the Pathways Programs?

Pathways positions must be advertised on USAJOBS. HTS will primarily utilize USA Staffing, a web-based tool that automates the hiring process, as the vehicle for posting vacancy announcements on USAJOBS, collecting applications, assessing candidates, and issuing certificates to hiring managers. Applicants must follow the application procedures outlined in the vacancy announcement for the position in which they are interested in applying.

310.59 May vacancy announcements for Pathways positions be limited to current NARA staff?

- a. If the position is to be filled as a temporary intern position, the vacancy announcement area of consideration may be limited to current NARA employees on a Pathways Internship appointment.
- b. If the position is to be filled as a nontemporary intern position or through the Recent Graduates Program, the announcement may not be limited to NARA staff. Such vacancy announcements must be open to the general public.

310.60 How are applicants evaluated for Pathways positions?

Applicants for Pathways positions must be considered for appointment in accordance with merit system principles and the regulations established in 5 CFR Part 302, Employment in the Excepted Service. The following methods of rating, ranking and referring applicants for Pathways appointments will be utilized:

- a. Unranked order;
- b. Ranked order; or

c. Quality group order.

The method used to evaluate candidates can and will vary by posting and by Program. The unranked order method would most likely be used to fill lower-graded, non-professional positions that are of a temporary nature (i.e., temporary internships), whereas the ranked and quality group order methods would be more suitable for technical or professional positions and positions that would lead to permanent employment (i.e., internships without time limit and recent graduate appointments). The HTS staffing specialist will discuss each of these methods with the hiring manager at the beginning of the recruitment process as the method for evaluating and referring applicants must be determined prior to posting. (see pars. 310.61 – 310.67)

310.61 How are applicants rated and referred under the Unranked Method?

Applicants will be evaluated against the OPM qualification standards for the position. No further qualitative rating will be conducted. Qualified candidates will be referred to the hiring manager in veteran preference order as follows:

- a. Preference eligibles having a compensable, service-connected disability of 10 percent or more;
- b. All other candidates eligible for 10-point veteran preference;
- c. Candidates eligible for 5-point veteran preference; and
- d. Candidates not eligible for veteran preference.

310.62 How are selections made under the Unranked method?

The hiring manager must make a selection from the highest preference category as long as at least two candidates remain in that group. When fewer than three candidates remain in the highest group, consideration may be expanded to include the next category.

310.63 How are applicants rated and referred under the Ranked method?

Applicants will be evaluated against the OPM qualification standards for the position. Qualified candidates will be further evaluated against an assessment tool (e.g., occupational questionnaire) to determine the degree to which they possess the required skills and competencies and be assigned a numerical score ranging from 70 to 100. Additional points will be added to the score of candidates' with 5-point or 10-point veteran preference, as applicable. Candidates will be referred to the hiring manager in score and veterans' preference order, with compensable, service-connected disabled preference eligibles of 10 percent or more at the top of the list (except in the case of scientific or professional positions at the GS-9 or higher).

310.64 How are selections made under the Ranked method?

When making an appointment from a list on which candidates have received numerical scores, the hiring manager must make a selection from the top three qualified candidates without bypassing a candidate with veterans' preference to select a candidate without preference. (Note: This process is comparable to the "rule of 3" selection process formerly used for filling positions in the competitive service.)

310.65 How are applicants rated and ranked under the Quality Group method?

The Quality Group method parallels the principles and practices of category rating, which is a process for rating, ranking and referring candidates for positions in the competitive service.

Applicants will be evaluated against the OPM qualification standards for the position. Qualified candidates will be further evaluated against an assessment tool (e.g., occupational questionnaire) to determine the degree to which they possess the required skills and competencies and be assigned a score ranging from 70 to 100. The candidate's score will be converted to a category rating band, i.e., Best Qualified, Well Qualified, or Qualified. Candidates in the best qualified category will be referred to the hiring manager for further consideration. Qualified veterans are placed ahead of non-veterans within each category. Qualified veterans with a service-connected disability of 10 percent or more are placed at the top of the best qualified group (except in the case of scientific or professional positions at the GS-9 level or higher).

310.66 How are applicants selected under the Quality Group method?

Hiring managers may make selections from within the highest quality category regardless of the number of applicants. However, preference eligibles receive absolute preference within each category. If a preference eligible is in the highest quality category, a hiring manager may not select a non-preference eligible. If there is more than one preference eligible in the highest quality category, any of the preference eligibles may be selected.

310.67 Do veterans' preference procedures apply to all methods of selection?

Yes. A hiring manager may not select a non-preference eligible before selecting a higher ranked preference eligible or a preference eligible within the same category/group unless an objection/passover is sustained by the Director, HT or OPM, as applicable.

310.68 Are there any additional requirements that must be met before hiring an intern or recent graduate?

Yes. Upon selection, the hiring manager must complete NA Form 3073, Internship Program Participant Agreement or NA Form 3074, Recent Graduates Program Participant Agreement, as appropriate, that sets forth the expectations for the Program, including but not limited to:

- a. A general description of the duties;
- b. Work schedules;
- c. The length of the appointment and termination date;
- d. Mentorship opportunities (required for Recent Graduates; optional for Interns);
- e. Training requirements, as applicable;
- f. Evaluation procedures that will be used for the Pathways employee;
- g. Requirements for continuation and successful completion of the program; and
- h. Minimum eligibility requirements for noncompetitive conversion to term or permanent competitive service employment.

310.69 May Pathways employees be promoted?

- a. Interns appointed on a temporary basis may not be promoted noncompetitively. Temporary interns may apply for higher graded intern positions through the vacancy announcement process.
- b. Interns appointed without time limit may be promoted if they meet the qualification requirements for the next higher position of their career ladder (if applicable), are performing successfully in the position, and have completed any applicable training requirements. This provision does not confer entitlement to promotion.

- c. Recent graduates may be promoted during their 1-year program if they meet the qualification requirements for the next higher position of their career ladder, are performing successfully in the position, and have completed any applicable training requirements as outlined in their IDP. This provision does not confer entitlement to promotion.

310.70 What is the process for promoting a nontemporary intern or recent graduate?

The supervisor must submit a personnel action request in FPPS, along with a classified position description, to HTS at least one full pay period prior to the proposed effective date.

310.71 May interns be reassigned to other intern positions?

- a. Interns appointed on a temporary basis may not be reassigned. Temporary interns may apply for other intern positions through the vacancy announcement process.
- b. Interns appointed without time limit may be reassigned to other intern positions at the same grade, series, full performance level, and duty station, provided the intern's academic or career goals are related to the work of the new position.

310.72 What is the process for reassigning a nontemporary intern to a different intern position?

The supervisor of the gaining organization must submit a personnel action request in FPPS, along with the following documents, to HTS at least one full pay period prior to the proposed effective date.

- a. A classified position description;
- b. A new or revised IDP; and
- c. Performance standards for the new position.

310.73 May interns be detailed to other positions or to perform other work?

No. Details are not permissible under the Internship Program.

PART 5 - PAY, BENEFITS, AND LEAVE

310.74 At what rate are Pathways employees paid?

Pathways employees are paid at the appropriate pay rate for the grade of the position to which they are appointed. They are also entitled to premium pay such as overtime and holiday pay as authorized by OPM's regulations.

310.75 Do Pathways employees count against NARA's full time equivalency (FTE) ceiling?

Yes.

310.76 Are Pathways employees eligible for health and life insurance benefits?

- a. Interns hired on a temporary appointment are generally not entitled to these benefits. However, once these interns have been continuously employed for a year without a break in service exceeding five days, they may elect health benefits coverage. Temporary interns pay 100 percent of the premium (i.e., both the employee and government share).

- b. Interns and Recent Graduates are eligible for health and life insurance coverage as long as they are expected to be employed under this appointment for over one year and are expected to be in a pay status for at least one-third of the total time from the date of their initial appointment to the date of the completion of the program. Cost of premiums is split between the employee and the agency as with permanent employees.

310.77 Are Pathways employees eligible for annual and sick leave?

Yes. Employees hired under the Pathways Programs on appointments for 90 days or more are eligible to earn annual and sick leave.

310.78 Are Pathways employees eligible for retirement benefits?

- a. Interns on temporary appointments are generally ineligible for retirement coverage, however, will have FICA (i.e., Social Security) deductions withheld from their pay.
- b. Interns and Recent Graduates are eligible for retirement benefits if their appointments are for more than 1 year.

310.79 Are Pathways employees eligible for awards?

Yes. Employees hired under the Pathways Programs are eligible for performance, special act, and other monetary and honorary awards based on their contributions to NARA and the Federal Government.

PART 6 – MANAGING PERFORMANCE

310.80 Are Pathways employees subject to a trial period?

- a. Interns on temporary appointments are not subject to a trial period.
- b. Interns on appointments without time limit and Recent Graduates serve a trial period upon initial appointment as described in NARA 307, Probationary and Trial Periods, Part 3, Excepted Service Trial Periods.

310.81 Do Pathways employees receive performance plans and appraisals?

Yes. Supervisors must provide Pathways employees with written performance plans and conduct appraisals on their performance in accordance with NARA's Performance Management System (see Personnel 300, Chapter 430).

310.82 What should a supervisor do if a Pathways employee is not meeting performance expectations?

Supervisors should contact NARA's Performance Management Program Manager and the PPO for guidance on managing Pathways employee performance.

310.83 Can an intern or recent graduate be terminated because of poor performance?

NARA may terminate any Pathways participant for misconduct, poor performance, or suitability issues under the applicable provisions of Title 5. Supervisors should contact the PPO and Labor/Employee Relations and Benefits Branch (HTL) for guidance on terminating a Pathways participant.

PART 7 - RECORDS MANAGEMENT

310.84 How are records created by this directive maintained under the NARA Records Schedule?

- a. HTS maintains:
 - i. Recruitment case files for Pathways positions under file no. 323, "Certificate of Eligibles Files."
 - ii. Pathways Program records under file no. 308, "Personnel Office Subject Files."
 - iii. Official records of Pathways appointments, NA Form 3073s (Internship Program Participant Agreement), and NA Form 3074s (Recent Graduates Program Participant Agreement) in Pathways employees' electronic Official Personnel Folders (e-OPFs). Follow OPM's guidance regarding maintenance of e-OPF documents. The NARA Records Schedule contains disposition instructions only for paper records of OPFs per file no. 301.)
 - iv. Performance appraisals in Employee Performance File (EPF) System Records (see file no. 305-4).
- b. Supervisors at the National Personnel Records Center (AFN), all Federal Records Centers (AFO), all Field Support Offices under the Field Support Management Division (BQ), and Archival Operations units in the East (RE), St. Louis (RL), Midwest (RM), and West (RW) use:
 - i. File no. 269-2 for interview records.
 - ii. File no. 269-1 for Pathways employees' unofficial personnel files (UPFs), including copies of IDPs.
- c. All supervisors in remaining organizations maintain:
 - i. Interview records for 2 years in accordance with the disposition instructions in file no. 323.
 - ii. Employee-specific records (including copies of IDPs) in Pathways employees' UPFs under file no. 303-1.
- d. For personal reference, interns and recent graduates are advised to keep copies of SF-50s, Notification of Personnel Action, the participant agreement, the IDP, and any other related documents. However, these personal copies must not be filed with records maintained by the supervisor or elsewhere in the unit.