



February 13, 2026

Mr. Scott Kupor
Director, Office of Personnel Management
1900 E St. NW
Washington, D.C. 20415-1000

Re: RIN 3206-AO89, "Ensuring Consistent and Rigorous Standards for Senior Executive Service Candidate Development Programs"

Dear Mr. Kupor:

The Partnership for Public Service submits these comments on the rule proposed by the Office of Personnel Management entitled "Ensuring Consistent and Rigorous Standards for Senior Executive Service Candidate Development Programs," RIN 3206-AO89, published in the Federal Register on December 18, 2025.¹ The Senior Executive Service (SES) is a vital component of agency leadership, but has historically been underinvested in and not received the level of attention needed to ensure that future leaders are well-prepared to step into SES roles.

The Partnership applauds the proposed rule's focus on improving an underused pathway into SES roles – Candidate Development Programs (CDPs). These programs help individuals develop core executive skills and speed up the process of hiring qualified candidates when SES positions open. But, as stated in the NPRM, only 13 federal agencies have current CDP programs, and such programs are often run and advertised in an ad-hoc way that does not help strategically develop and deploy the next set of career senior leaders.

Below, we offer recommendations and considerations related to workforce planning integration, program structure and management, and the use of assessments in the candidate selection process.

¹ 90 FR 59072

CDPs Should Support Holistic, Strategic Workforce Planning

We commend the administration’s focus on improving the training and development of future leaders, which is crucial for ensuring our government has the right people in place to lead their agencies through the challenges and opportunities of tomorrow. CDPs are one tool that help agencies develop leaders that are prepared with the skills critical to agency success, but greater reforms are needed to build a strong leadership pipeline. Without broader changes and effective workforce planning, agencies will continue accepting individuals into, and graduating individuals from, CDPs without the skills that correspond to the agency’s future needs – that is, building a bench, but filling it with players from a different sport.

Both the entry and exit points for CDP programs deserve attention. Right now, few agencies run CDPs and their existence is not well-known among eligible employees. Participation often depends on an individual having a manager who happens to point them in the right direction. Even when employees want to participate in a CDP, agencies may be reluctant to let them do so because they will continue to occupy a full-time slot on the team while their capacity is ²⌘. Allowing agencies to temporarily or permanently backfill for someone in a CDP—particularly if there is a clear pathway for the trainee to move into an SES role upon CDP completion—will make it easier for agencies to provide leadership development opportunities for their best employees. Agencies also should use skills-based hiring and assessments earlier in careers to identify, and then develop and train, individuals with the right skills to become an SES before they reach the level of GS-15.

Once individuals complete CDPs, many wait an extended period of time for SES roles or are simply never placed into one at all. Better workforce planning is needed to ensure that agencies have an adequate bench of capable SES candidates ready as slots open to avoid vacancies and to prevent wasted resources spent preparing leaders that don’t match an agency’s needs. In addition to workforce planning, creating a centralized, government-wide roster of CDP graduates would allow agencies to more easily find and recruit from the full pool of Qualification Review Board (QRB)-certified SES candidates – and avoid having qualified graduates sit underutilized.

² One model of leadership development training to consider is the Department of Defense’s use of central billets and funding to allow employees in leadership development programs to move out of FTE slots on their team to central positions for the program’s duration, so their original team can backfill the position.

Ensuring that QRBs and Executive Review Boards (ERBs) operate efficiently, transparently and in a politically neutral manner³ will further enable higher CDP graduate placement rates. Agencies would also benefit from efforts to counteract misconceptions on prohibited preselection practices and foster a culture of intentional succession planning such that high-performing GS-14s and 15s are identified and pointed towards leadership pipelines.

Finally, a CDP should be only one step in leadership development that is preceded and followed by additional training, mentoring and developmental opportunities, not a “one and done” event. Once an employee graduates from a program and is placed into an SES role, performance management and development should be an ongoing process of continuous improvement long beyond program completion.

Career-long employee development will help SES develop the full range of skills required for public sector leadership. Recent updates to the ECQs focus solely on organizational results, discounting other critical elements of what modern leaders should be accountable for. Public sector leaders require a different bottom line than private sector—including stewardship of public trust and commitment to public good—and we recommend basing both CDPs and other development programming on leadership models that include these critical skills.⁴

The following are a few specific areas we offer for further consideration:

Improved Consistency and Quality Can Enhance Skill Development, but Program Structure and Management Changes Could Impose Undue Burdens

- The Partnership commends the increased focus on coaching and rotational assignments proposed by this regulation. Both are best practices for leadership development programs and will help CDP participants develop skills, apply what they learn, and retain their training.
- OPM should not prescribe a specific number of hours for each of the proposed training topics listed in § 412.302. Setting specific hourly requirements for topics creates a rigid framework and would not allow agencies the flexibility needed to prepare future leaders for the unique conditions and challenges of their agency.

³ <https://ourpublicservice.org/wp-content/uploads/2018/10/SES-Joint-Policy-Agenda.pdf>

⁴ <https://ourpublicservice.org/public-service-leadership-institute/public-service-leadership-model/>

- Standardizing requirements for CDPs may make it easier for agencies to run them; however, OPM should avoid overly restrictive standards and reporting requirements or creating a one-size-fits-all program for agencies with different needs, workforces and missions. Because CDPs are not mandatory programs, overburdening them with excessive red tape may discourage agencies from running them.
- While we agree that a shortened CDP length may encourage more employees to join, it also puts additional pressure on participants. Asking full time employees to do their job, participate in the CDP with increased training hours and complete a developmental assignment at the same time risks overwhelming employees. Programs should be monitored to ensure that a shortened timeline does not decrease program quality or value for participants.
- The Partnership supports program evaluations to ensure that CDPs are effective and that they continually improve and use taxpayer resources effectively. However, this presumes that agencies have the capacity to not just conduct evaluations but also make changes based on the findings. For evaluations to be worthwhile, agencies must have HR offices that contain measurement expertise and work closely with the performance and program evaluation teams in agencies to tie CDP outcomes to organizational impact.
- Metrics for program evaluations should be chosen carefully to avoid creating excessive burden. We recommend using metrics that will measure the applicability of program lessons to real-world challenges and if participants feel more prepared for an SES role upon completion of a CDP. We also recommend tracking SES performance data over time to evaluate the outcomes of SES members who went through CDPs compared to those who did not.
- Minimum placement rates may also be a helpful metric to ensure that CDPs are training future leaders with the skills and experience needed to move into SES roles. To be an effective tool, however, rates must be set using a strategic workforce planning process. Arbitrary placement rate levels will do little to alleviate the long delays between program completion and placement that many CDP graduates experience.⁵

⁵ <https://ourpublicservice.org/wp-content/uploads/2013/07/9fa59e1bf79d8e17d83729f4c97c716b-1396975476.pdf>

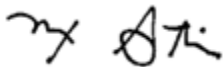
Proposed Usage of Executive Assessments Risks Inappropriate Candidate Selection Procedures

- We do not recommend using psychometric or behavioral screening assessments for CDP selection. These assessments should measure a candidate's starting point and growth, not be used to evaluate candidates for selection.
- Given the new use of political essay⁶ in hiring processes, the proposed use of unspecified assessments as a criterion for CDP selection is concerning. Political preferences should not be part of the CDP selection process, and any applicant assessments should follow the ⁷Employee Selection Procedures.⁸
- If assessments are used to select candidates for a CDP, they should evaluate candidates against the ECQs and potentially consider the specific skills needs of each agency's leadership cadre as identified through workforce planning.

The Partnership supports changes to make CDP requirements more consistent, and selection and candidate development tools more rigorous; however, focusing on disparate pieces of the puzzle alone will not achieve successful reform of the SES. We encourage OPM to thoughtfully consider both the details of this regulation's implementation and broader reforms to federal leadership development to ensure that agencies have a strong bench of current and future leaders.

Thank you for the opportunity to submit these comments.

Sincerely,



Max Stier
President & CEO
Partnership for Public Service

⁶ <https://www.opm.gov/policy-data-oversight/hiring-information/merit-hiring-plan-resources/merit-hiring-plan-frequently-asked-questions/>

⁸ <https://www.uniformguidelines.com/uniform-guidelines-qa.html>