PARTNERSHIP FOR PUBLIC SERVICE

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August 3, 2026

Mr. Scott Kupor
Director, Office of Management and Budget
The Office of Management and Budget
1900 E St. NW
Washington, DC 20415-1000

Re: Docket ID: OPM-2026-0368 | RIN 3206-AO77, "Personnel Management in Agencies: Strategic Human Capital Management," Proposed Rule, 91 Fed. Reg. 40435

Dear Director Kupor:

The Partnership for Public Service submits these comments on the Office of Personnel Management's propose ruled entitled "Personnel Management in Agencies: Strategic Human Capital Management," Docket ID: OPM-2026-0368; RIN 3206-AO77, published in the Federal Register on July 2, 2026.

The Partnership is a nonprofit, nonpartisan organization committed to building a better government and a stronger democracy. Core to our mission is the belief that a merit-based, nonpartisan civil service, who represents the diversity of the country, is central to our system of government. Since the Partnership's founding over 25 years ago, we have advocated across administrations for changes to federal law, regulations, policies, and programs that improve our government's ability to attract, hire and retain a talented and diverse workforce that effectively serves the public.

For many years, the Partnership has championed the importance of strategic human capital planning across the federal civil service. We support the proposed rule's emphasis on requiring agencies to engage in deliberate, forward-looking workforce planning that identifies hiring priorities, addresses workforce gaps and anticipates future talent needs. But as drafted, the proposed rule establishes Annual Staffing Plans as the primary mechanism for workforce planning and accountability. Additionally, we have several recommendations for portions of the rule and offer these considerations below.

Annual Staffing Plans and Quarterly Staffing Plan Performance Reviews

The move to rename various agency human capital plans on its face is not concerning. However, the move to designate these plans as "staffing plans" may create unintended confusion. Every agency should have a strategic human capital plan – which accounts for alignment with administration priorities, budget, organizational performance, etc. and considers broad trends in talent needs and areas for investment or change. This is a bigger picture plan for large organizations with complex talent management needs. On the other hand, a staffing plan connotes a much more detailed and in the weeds document about specific staffing needs within bureaus and program offices. These plans may change more quickly and take into account specific FTE needs, skills needs, and other specific challenges. If the proposed rule is going to align plans with more strategic elements such as the Government Performance and Results Act (GPRA) or the President's Management Agenda, then it should delineate between strategic human capital planning and agency-specific operational staffing planning. They should not be one and the same.

Agency Staffing plans should be led by the CHCO and be coordinated with the CFO, COO, and other senior leadership to ensure that offices and teams within the agency have the people and skills needed to do their jobs. Just like any private sector organization operates. Many agency offices and programs, along with daily staffing needs, are not directly tied to broader elements like Agency Priority goals (APGs), Federal priority goals, or the President's Management Agenda. Jobs within agencies are driven by mission needs of the agency, including carrying out laws passed by Congress.

By contrast, strategic human capital planning would take into account APGs, the PMA and other broad administration priorities. It would align to agency strategic planning, budget planning, and be part of the bigger picture that leadership at an agency should consider and plan toward. This includes talent strategies to ensure that highest priority goals are appropriately resourced and managed toward outcomes.

Strategic human capital management should be aligned with other drivers of organizational performance. These include:

Government Performance and Results Act (GPRA)

- Timelines for submission of staffing plans should mirror the timelines outlines in P.L. 111-352 to ensure alignment between human capital planning and agency performance planning.
- Establishing this connection would ensure workforce planning directly supports mission outcomes rather than functioning as a separate administrative requirement.[1]
- Explicitly tying strategic human capital decisions to GPRA timelines would reinforce the relationship between people, performance, and agency results.

OMB Circular A-11

- The proposed rule should also explicitly reference OMB Circular A-11, particularly Part 6, which governs agency strategic planning, performance planning, and budget formulation.
- Human capital plans and quarterly reviews should align with existing A-11 planning and reporting timelines.[2]
- Aligning workforce planning with budget development would allow agencies to make staffing and resource allocation decisions in tandem rather than after budgets have already been developed.
- Synchronizing these timelines would reduce duplication and strengthen coordination among workforce planning, budgeting, and performance management activities, as well as reinforce the principle that staffing decisions should support agency performance goals and available resources.

Government Accountability Office's High-Risk List

- Strategic human capital management has remained on the GAO High-Risk List since 2001, demonstrating that workforce management continues to be one of the federal government's most significant long-term management challenges.[3]

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[1] U.S. Department of Labor, Employment and Training Administration, Government Performance and Results Act (GPRA), U.S. Department of Labor, https://www.dol.gov/agencies/eta/performance/goals/gpra

[2] Office of Management and Budget. Circular No. A-11: Preparation, Submission, and Execution of the Budget, Executive Office of the President, Aug. 2025, https://www.whitehouse.gov/wp-content/uploads/2025/08/a11.pdf.

[3] U.S. Government Accountability Office, High-Risk Series: Heightened Attention Could Save Billions More and Improve Government Performance, GAO-25-107743, U.S. Government Accountability Office, 25 Feb. 2025, https://files.gao.gov/reports/GAO-25-107743/index.html.

- Although the proposed rule ties the annual staffing plans and human capital management to GPRA, it should also direct agencies to address challenges raised by the High-Risk list generally around Strategic Human Capital management and within other GAO high risk areas.

Congressional Budget Justifications (CBJs)

- Agencies should consider incorporating a dedicated workforce section into CBJs that address staffing priorities, critical occupations, capability gaps, succession planning, workforce risks, training investments and future talent needs.
- Greater integration of workforce planning into CBJs would improve transparency and accountability. Rather than requiring agencies to produce another standalone planning document, incorporating workforce strategies into an existing, high-profile budget and resource document would better demonstrate how investments in the federal workforce support mission delivery.

We agree with integrating Quarterly Staffing Plan Performance Reviews into existing strategic performance reviews because it strengthens the role of CHCOs in the planning process, aligns workforce planning with performance management, and potentially reduces administrative processes. But again, we suggest that these reviews be clear that they are for strategic human capital planning, not day to day staffing planning.

Additionally, the CHCO and the agency performance officer should collaborate in the creation of metrics, key performance indicators, and agency performance plans to set clear, measurable outcomes and metrics for staffing plans and for strategic planning. These should be part of quarterly reviews and must align with any other quarterly reviews that an agency undertakes as part of its organizational performance management process.

Alignment With President's Management Agenda

The Partnership appreciates the intent to align strategic human capital management with broader government priorities. However, the proposed rule places too much emphasis on aligning agency workforce management with the President's Management Agenda.[4] While the PMA may appropriately influence government-wide initiatives and high-impact, cross-agency priorities, it should not drive agencies' day-to-day talent management practices or specific staffing plans given that not every agency or every office within an agency might be tied to the broad goals within a PMA.

We recommend that the rule be amended to remind agencies to consider the PMA as one element in their human capital strategic planning and not as an element intended for day-to-day staffing requirements.

Enabling CHCO Leadership Over Strategic Human Capital Management

We strongly support elevating the role of Chief Human Capital Officer (CHCO) within agency planning. Human capital decisions are mission decisions, as agencies cannot achieve their strategic goals without the workforce needed to execute them. To ensure workforce considerations are fully integrated into strategic planning, CHCOs should have a consistent seat at the leadership table alongside other C-suite

[4] OMB, President's Management Agenda (Dec. 8, 2025), available at https://www.whitehouse.gov/ wp-content/ uploads/ 2025/ 12/ M-26-03-Presidents-Management-Agenda.pdf.

colleagues when setting priorities, managing organizational changes and making resource decisions. Simply put, agencies cannot achieve results without people, and workforce leadership must be represented whenever mission priorities are established, monitored and adjusted. Given the role that GPRAMA creates and envisions for the Chief Operating Officer, we recommend that the proposed rule more explicitly direct agency CHCOs to coordinate with the agency Chief Operating Officer, particularly if that position is not held concurrently by the Deputy Secretary.

Strategic Hiring Committees

If agencies move forward establishing Strategic Hiring Committees, we recommend that they are appropriately staffed and focused on the enterprise level. We suggest the strategic hiring committees have the following elements:

- Given the positions envisioned staffing the committee, it should remain focused on strategic workforce priorities rather than becoming involved in the approval of every individual hiring action and day to day staffing planning.
- Their primary responsibility should be establishing agency-wide hiring priorities, identifying mission-critical workforce needs and ensuring hiring strategies support long-term organizational goals and are appropriate aligned to agency and administration priorities.

Moreover, we suggest the following personnel for committee membership or explicit advisory roles: Chief Human Capital Officer (CHCO), Chief Financial Officer (CFO), Performance Improvement Officer (PIO), Chief Information Officer (CIO), and the Deputy Secretary/COO (or equivalent).

- While many agencies designate the CFO as the PIO, this is not universally the case.
- When the CFO and PIO are different individuals, the regulation should explicitly require both officials to participate.
- Including the PIO ensures agency performance management expertise is represented during workforce planning and staffing discussions.

Annual employee surveys are important performance tools

For over 20 years, OPM's Federal Employee Viewpoint Survey has ensured that consistent questions were asked across agencies and over multiple administrations. In taking a shared service approach, they provided valuable data to the public, Congress and agency leaders about agency performance, leadership effectiveness, and employee engagement.

Measuring and improving employee engagement is one of the most cost-effective approaches our government can take to improving service delivery. Engagement levels have been proven[5] to impact organizational performance, retention and customer experience.

OPM's decision to require agencies to complete their own survey and change required questions will impact the utility of these surveys as envisioned by Congress. Our insights provide guidance for why these changes should be rescinded while still modernizing the survey and how agencies can best be supported in carrying out their own surveys in the event this rule is finalized as is.

[5] Partnership for Public Service and Boston Consulting Group, A Prescription for Better Performance: Engaging Employees at VA Medical Centers, Mar. 2019, https://ourpublicservice.org/wp-content/uploads/2019/03/BPTW18_VA-issue-brief.pdf

The Benefits of OPM Running the Federal Employee Viewpoint Survey

OPM's decision to cancel the FEVS and require agencies to run their own surveys will likely prevent the public and Congress from having access to comparable employee engagement data across agencies and administrations and will likely make it impossible to fully understand the management practices and effectiveness of our government in carrying out its responsibilities.

Comparing data across agencies and administrations matters. Benchmarks are needed to understand what the survey results are telling us and to hold organizations and leaders accountable. However, creating comparative data across a set of separate surveys requires a level of collaboration or standard setting that goes beyond what OPM has communicated so far.

The proposed rule change says that OPM would like to statistically compare results from various agencies. However, if agencies conduct their own surveys without common methodological standards, survey timing, sampling, weighting methods or reporting requirements, comparison will likely not be possible. We support OPM's requirement that agencies submit survey data to OPM and OMB within 90 days and to the public in 120 if they can consistently meet these standards. Under the new rule, OPM should also establish consistent expectations and commit to publicly cumulating the results across agencies to provide a holistic picture of the state of the full federal workforce. Effective implementation would enhance transparency through public recognition, strengthen accountability, and foster a culture of continuous learning across departments. Finally, due to the complexities of carrying out surveys and the current lack of dedicated personnel, many agencies will likely require support from an outside vendor to carry out these changes. Part of OPM's value in running the FEVS was administering one centralized contract that supported most federal departments. If the more than 70 agencies that previously took the FEVS must now each issue their own requests for proposals, evaluate vendors and manage their own contract, any cost savings that a centrally run survey accrued will disappear and in fact, will likely cost agencies more in the long run. Additionally, many smaller agencies may lack the funds to run the survey at all.

Safeguards and support are needed to ensure agencies can administer surveys responsibly

We strongly advise OPM to restore FEVS as a centralized tool. However, if agencies will now be required to manage their own surveys, there are a variety of essential processes and expectations that OPM and agency leaders must put into place to ensure their surveys are as valuable as possible under these circumstances.

Across different administrations, employees have questioned if they might face retribution for filling out the FEVS. Historically, OPM's administration of the survey ensured a neutral third party housed the data and enforced strict standards protecting respondent privacy. While OPM has provided recommendations[6] for replicating their previous security practices, agencies administering their own surveys creates an increased privacy risk for employees that will only exacerbate the concerns many had previously for completing the FEVS. If implemented as currently drafted, individual response data would likely be more easily accessible for leaders attempting to identify specific employee responses. This

[6] U.S. Office of Personnel Management, Employee Survey Playbook: A Guide for Federal Agencies to Design, Administer, and Report Employee Feedback, July 2026, https://www.opm.gov/chcoc/latest-memos/employee-survey-playbook.pdf

potential, or even the possibility that it could happen, may lead to employees choosing to not take the survey or feel pressured to respond in a favorable way[7] out of fear of retaliation.

If the federal government wants staff to share their honest perceptions of how management practices are influencing organizational outcomes, OPM's continued administration of the FEVS is the best approach. However, if agencies will be running their own surveys this year, they must implement transparent collection standards that bar leadership from obtaining access to individual respondent data and clearly communicate to staff their commitment to data security. Additionally, under OPM's current public reporting standards, agencies may choose to withhold information about their methodologies, response rates and results which could further undermine trust in the surveys and impede outside verification. To avoid this potential, OPM must add strict direction and oversight standards in their final regulation of language.

Finally, due to the removal of formerly required questions, agencies must add additional items to make these surveys meaningful accountability tools. However, OPM has stated that adding questions will require an additional Paperwork Reduction Act Information Collection Act review from OMB, which could likely add months to this survey process. OPM should avoid this additional level of burden on agencies by gaining approval from OMB to include a broader set of questions that agencies may choose from beyond the 10 required questions. Otherwise, the PRA approval process will likely deter agencies from tailoring their surveys to address their agency's unique needs or will add to the OMB OIRA existing backlog and delay employee engagement surveys.

Required Questions Need Further Refinements

Leadership and Management Practices

The law requires OPM to ask questions about leadership and management practices that contribute to agency performance. OPM seems to have reinterpreted that to only focus on individual managers and supervisors. The new required questions intentionally cut any framing around satisfaction with "management," the "agency" and the "organization," and instead only focus on "managers" and "supervisors." This effectively means that Congress will no longer receive metrics about agency-wide management practices as the law requires.

Additionally, the statute authorizing employee surveys requires the survey to address elements of employee satisfaction. For years, the FEVS contained questions used to measure employee engagement and satisfaction. Those questions included:

- I recommend my organization as a good place to work.
- Considering everything, how satisfied are you with your job?
- Considering everything, how satisfied are you with your organization?

These questions provided an essential role across multiple administrations in highlighting agencywide and governmentwide engagement levels to effectively benchmark departments and identify improvements and backsliding across administrations. OPM's decision to cut them consequently

[7] Rogelberg, Sasha, "The Federal Government Shed 385,000 Employees Last Year Now. the Trump Administration Is on a Blitz to Hire Gen Z Workers," *Fortune*, 31 Mar. 2026, https://fortune.com/2026/03/31/doge-cuts-opm-scott-kupor-federal-government-hiring-gen-z/

appears to be a direct effort to ignore the employee experience and avoid accountability for leadership and management practices over the last year and half.

In addition to returning these questions, we encourage OPM to add new required questions that ask about employee perceptions of the agency's performance that would allow for greater analysis on how perceptions of leadership are impacting service delivery for the public. One such approach for measuring this could include asking employees if they felt their agency's performance has changed over the last year on several consistent variables such as delivering quality services, fulfilling stakeholder needs and meeting important deadlines.

Additionally, when these questions are combined, they provide insights on what variables impact engagement and satisfaction. They have also been proven to be strongly correlated with employee retention, organizational effectiveness and customer experience. This information helps leaders prioritize areas for intervention, and without it, they will be in the dark.

Some of the former, optional questions in the FEVS around leadership practices needed slight wording adjustments but should remain required questions to increase leadership accountability. Former questions referring to "senior leaders" including, "In my organization, senior leaders generate high levels of motivation and commitment in the workforce" and "My organization's senior leaders maintain high standards of honesty and integrity," lacked a consistent definition for which leaders were the subject of the question.[8] We recommend adjusting the language for each leadership level to clearly demonstrate how perceptions of all leaders, both political and career, are impacting outcomes for the public.

Finally, most concerning is the loss of the question, "I believe the results of this survey will be used to make my agency a better place to work." Due to inconsistent internal communications and evolving internal priorities, agencies have struggled with this question for years. But it offered an actionable measure of how employees perceive existing feedback channels and encouraged leaders to respond more thoughtfully to staff concerns. Our analysis also demonstrated that agency scores on this question correlated with survey response rates, which suggests that employees were more motivated to take the survey when they felt leaders were being responsive to their feedback.

Professional Development

The proposed changes remove the questions "I am given a real opportunity to improve my skills in my organization," and "My talents are used well in the workplace." It instead includes, "My supervisor provides ongoing feedback to help me succeed and progress in my career," This new item correctly emphasizes the important role that supervisor feedback plays in helping employees grow in their responsibilities.

However, the question does not touch on any professional development opportunities organized or coordinated by the agency, nor does it touch on the supervisor's role in connecting employees to professional development opportunities. Therefore, the new question is not consistent with the requirement in statute[9] that requires surveys to address

[8] Senior Executives Association, "Setting the Record Straight on the Term 'Senior Leaders' in the FEVS," Senior Executives Association, www.seniorexecs.org/setting-the-record-straight-on-the-term--senior-leaders--in-the-fevs.

[9] United States Code, Title 5, Government Organization and Employees, Part III, Subpart F, Chapter 71, Subchapter I: General Provisions, Office of the Law Revision Counsel,

opportunities for professional development and growth. Addressing the role that the wider organization may play in this would require an additional question, though we encourage widening from the original 'improve my skills' phrasing to capture other professional opportunities and experiences that would benefit both the employee and their agency, such as details, mentoring, onboarding and traditional training opportunities.

Workload

The removal of the question "My workload is reasonable" leaves a critical gap. We recognize that the former question could use improvement, as an employee disagreeing with the statement does not capture in what ways the employee's workload is unreasonable. However, it should be reworked, not thrown out.

If there is an intention to ensure work is being tasked out as efficiently as possible and identify areas of staff underutilization and burnout risk,[10] it would be better to ask the employees how well the work they are given matches their capacity to complete it. The employee could then respond that they feel they are underutilized, near or at capacity or that their current workload is unsustainably beyond their capacity.

This is especially important given the mass cuts and departures in the federal workforce. If many employees have unreasonable workloads, that should be factored into staffing plans and appropriations, especially since persistent and widespread unreasonable workloads could lead to errors and mishaps, including in high-stakes environments such as emergency response.

The Partnership supports reforms that strengthen strategic, evidence-based human capital management and provide agencies with the tools, information and accountability necessary to make informed workforce decisions. Workforce planning and employee feedback mechanisms should be integrated with agencies' broader strategic planning, performance management and budget processes, while maintaining consistent standards that produce reliable, comparable data across government. OPM should ensure that reforms to FEVS and strategic workforce planning are grounded in enduring statutory and management frameworks, strengthening the role of CHCOs and cross-functional leadership, and providing agencies with timely, actionable information and the resources needed to implement meaningful change. Without these safeguards, changes to survey administration and workforce planning requirements could undermine data quality, create inconsistencies across agencies and ultimately limit leaders' ability to understand and address workforce needs, while also reducing transparency for the public and Congress into how the federal government is operating and managing its workforce. Ultimately, we believe the survey should be modernized and used as a more forceful management tool. We would welcome an opportunity to collaborate with OPM to achieve these results.

https://uscode.house.gov/view.xhtml?edition=prelim&req=granuleid%3AUSC-prelim-title5-chapter71-subchapter1

[10] Hunter, Lance Y., et al. "Telework and Work Flexibility in the United States Federal Government Post-Pandemic," Public Administration Quarterly, vol. 48, no. 3, 2024, p. 149. EBSCO Research, https://www.ebsco.com/articles/politics-and-government/7b5ec7df-74fd-560f-9e6d-509ce462977a/telework-and-work-flexibility-in-the-united-states-federal-government-post-pandemic

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Thank you for the opportunity to share our thoughts and recommendations. We welcome the opportunity to work together toward our shared goal of supporting the federal civil service today and in the future.

Sincerely,

Max Stier
President and CEO