

FOR IMMEDIATE RELEASE

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**Statement from Mary Kate Whalen, President of the Senior Executives Association,
on OPM's Proposed Rule Eliminating Time-in-Grade**

The Senior Executives Association supports the goal behind the Office of Personnel Management's proposed rule to eliminate the time-in-grade restriction on advancement within the General Schedule. SEA will file formal comments before the July 27 deadline.

"SEA has long advocated for a civil service that rewards capability and performance, and the time-in-grade requirement does not always serve that purpose," said Mary Kate Whalen, President of the Senior Executives Association. "We have seen capable career professionals held in place for a year while fully performing at a higher level. Giving agencies the flexibility to promote based on qualifications and demonstrated readiness, rather than time served, is a reasonable step, and one SEA welcomes."

The current rule requires employees in competitive service General Schedule positions at grades 5 and above to serve 52 weeks in grade before becoming eligible for promotion to the next grade. OPM proposes to remove that 52-week requirement while retaining occupational qualification standards and any additional job-related requirements. SEA agrees that the waiting period is a blunt instrument and that qualification standards, properly applied, are a better measure of readiness.

SEA's support depends on getting implementation right. Removing time-in-grade increases agency discretion over promotions, and that discretion needs guardrails to remain fair and credible. "Flexibility is valuable, and it is most durable when paired with consistent criteria that give employees confidence promotions are based on merit," Whalen continued. "If time-in-grade is eliminated, OPM should pair that flexibility with clear, merit-based promotion criteria, consistent documentation, and oversight of how the policy is applied across agencies. Transparent criteria give employees and agency leaders alike confidence that promotions reflect qualifications and performance."

SEA's comments will recommend specific safeguards, including merit-based promotion criteria defined in advance, consistent documentation requirements, and mechanisms for independent oversight such as audits and regular reporting to ensure policies are applied consistently across government. This approach is consistent with the position SEA has taken throughout the current civil service reform effort: flexibility and accountability work best when they are paired with transparent criteria and process. Experience with pay-banding demonstrations, including the

long-running Department of the Navy and Department of Defense systems, offers useful lessons on both the benefits of flexible advancement and the importance of consistent oversight in sustaining trust in those systems. OPM should draw on those lessons, and on the Government Accountability Office's pay-band studies, in shaping a final rule.

SEA looks forward to working with OPM, Congress, and stakeholders to ensure that any change to time-in-grade strengthens the merit system and serves the Administration and the American people.

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About the Senior Executives Association The Senior Executives Association (SEA) is a professional association representing career members of the Senior Executive Service (SES) and other senior career leaders across the federal government. SEA promotes effective government leadership, accountability, and the preservation of a professional, nonpartisan civil service.