



SENIOR EXECUTIVES ASSOCIATION

SEA - The Voice of Senior Executives

August 3, 2026

Submitted via www.regulations.gov

Makisha Brown

Office of Personnel Management

1900 E Street NW

Washington, DC 20415

Re: SEA Comments on the Proposed Rule, “Personnel Management in Agencies: Strategic Human Capital Management,” 91 FR 40435 (July 2, 2026); Docket ID OPM–2026–0368; RIN 3206–AO77

Dear Ms. Brown:

The Senior Executives Association (SEA) submits these comments on the proposed rule issued by the Office of Personnel Management (OPM) that would amend 5 CFR part 250, “Personnel Management in Agencies: Strategic Human Capital Management” (the “Proposed Rule”). Founded in 1980, SEA is a nonpartisan, non-profit professional association representing career members of the Senior Executive Service and other career federal leaders. Our members lead the organizations that carry out the day-to-day work of government, and they do so under an obligation to serve the Constitution and the American people with equal skill across administrations.

SEA supports OPM’s stated goal of replacing a fragmented set of planning and reporting requirements with a more streamlined, performance-oriented framework, and we support several of the Proposed Rule’s core objectives, including reducing duplicative reporting and strengthening the authority of agency Chief Human Capital Officers (CHCOs). We also identify several places where the Proposed Rule should be sharpened so that consolidation does not come at the expense of the rigor that strategic workforce planning requires. Our comments are arranged by subject, corresponding generally to the order of the Proposed Rule. SEA believes that efforts to modernize strategic human capital management should continue to reinforce the merit system principles that have long guided the federal civil service, ensuring workforce decisions remain transparent, evidence based, and aligned with mission needs.

Strengthening CHCO Visibility, Oversight, and Control (Proposed § 250.204(e))

SEA strongly supports the proposed requirement that each agency ensure its internal delegations, organizational structure, policies, and technological systems give the CHCO sufficient visibility, oversight, and control to carry out the statutory functions assigned under 5 U.S.C. 1401 and 1402. As OPM’s own preamble recognizes, this has been a persistent, longstanding problem: GAO reported more than a decade ago that CHCOs were routinely excluded from strategic planning, and OPM acknowledges that this gap remains today. SEA has long advocated for elevating the institutional standing of career human capital leadership, and this provision is a meaningful step in that direction.

As drafted, however, the provision states an obligation without a mechanism for verifying compliance. SEA recommends that the final rule direct OPM to require an annual, agency-head-certified attestation, reviewed as part of the Annual Staffing Review, confirming that the CHCO in fact has the visibility, oversight, and control the rule requires, with any gaps identified and a remediation timeline attached. Without such a mechanism, this important reform risks becoming aspirational language rather than an enforceable standard.

Consolidating Planning and Review Requirements (Proposed §§ 250.205–250.207)

SEA supports replacing the Human Capital Operating Plan, Human Capital Reviews, and HRStat quarterly reviews with the Annual Staffing Plan (ASP), Annual Staffing Review (ASR), and Quarterly Staffing Plan Performance Review. Reducing the number of overlapping planning and reporting obligations should free CHCOs and human resources staff to spend more time on substantive workforce management rather than compliance paperwork.

SEA is concerned, though, that consolidation could dilute attention to leadership succession if the final rule does not say so explicitly. Multi-year investment in developing a bench of qualified career executives is different in kind from annual hiring and staffing metrics, and it can be crowded out when folded into a single annual document oriented around near-term hiring needs. SEA recommends that the final rule specifically require each ASP to address succession planning and leadership bench strength for Senior Executive Service and other mission-critical leadership positions, consistent with the Human Capital Framework’s existing emphasis on “ensuring continuity of effective leadership.”

SEA also recommends that OPM clarify how Quarterly Staffing Plan Performance Reviews, which the Proposed Rule folds into agencies’ existing 31 U.S.C. 1121(c) performance reviews, will guarantee adequate, dedicated attention to workforce metrics. Embedding these reviews within a broader program performance meeting reduces the CHCO’s administrative burden, which SEA supports, but it also creates a risk that workforce issues receive only cursory treatment amid competing agenda items. SEA recommends that the final rule or accompanying guidance specify a minimum standing agenda allocation for workforce metrics within the combined review.

Strategic Hiring Committees (Proposed § 250.204(f))

SEA supports the requirement that the CHCO be a required member of each agency’s Strategic Hiring Committee alongside the Deputy Secretary or equivalent. Placing career human capital leadership at the table for hiring decisions is consistent with the CHCO Act’s purpose.

SEA recommends one addition. A committee composed only of the Deputy Secretary and the CHCO may lack the program-specific, mission expertise needed to evaluate whether a given hiring action truly serves the agency’s highest-need areas. SEA recommends that the final rule require the Strategic Hiring Committee to solicit written input from the relevant career senior executive with programmatic responsibility before acting on a position within that executive’s chain of command. Including the relevant career senior executive will preserve the committee’s authority to make the final call while ensuring its decisions are informed by the career leaders closest to the work, and provide necessary continuity and consistency during leadership transitions.

Reliance on the President’s Management Agenda (Proposed § 250.204)

SEA supports sunseting the Federal Workforce Priorities Report, which OPM’s preamble and prior rulemakings acknowledge has not driven the coordination GAO originally envisioned. We agree that tying agency workforce planning to the President’s Management Agenda (PMA) can make human capital planning more actionable.

Because the PMA changes with each administration, SEA recommends that the final rule direct OPM to also maintain a stable, governmentwide set of core human capital metrics — for example, time-to-hire, closure of mission-critical skills gaps, and retention in mission-critical occupations — that persist across PMA cycles. A stable baseline would allow agencies, OPM, and Congress to track genuine multi-year human capital progress independent of which priorities a given administration happens to emphasize, without detracting from the PMA’s value as the near-term driver of agency action.

Annual Employee Survey Changes (Proposed §§ 250.302, 250.303)

SEA supports OPM’s effort to make the annual employee survey a more useful management tool rather than, in the preamble’s words, a “popularity contest,” and we support giving agencies more flexibility in administering and reporting the survey.

Reducing the required questions from 16 to 10, while substituting or removing 11 of the current questions, is a substantial change to an instrument agencies have used for year-over-year comparisons. SEA recommends that OPM publish a bridge analysis showing how the retiring and incoming questions relate to one another, so that agencies do not lose the ability to track trends across the transition, and that OPM retain a floor of governmentwide comparability even as it decentralizes survey administration.

SEA also recommends one substantive addition to the 10 proposed questions. None of the proposed questions directly measures whether high-performing employees see a viable path into senior leadership and career executive positions. Because this rule is aimed squarely at strengthening accountability and leadership within the career service, SEA recommends adding a question on perceived opportunities for advancement into senior executive roles — a leading indicator of the health of the leadership pipeline that this rule, and SEA’s members, care most about.

Implementation Resources and Timeline

OPM estimates that agencies will need approximately 100 hours of staff time, at a cost of roughly \$15,630 per agency and \$1,250,400 governmentwide, to implement the new framework. SEA believes this estimate likely understates the resources CHCOs and human resources offices will need to stand up new ASP, ASR, and Quarterly Staffing Plan Performance Review processes — particularly because agencies are implementing these changes in the same period as Executive Order 14356’s Strategic Hiring Committee and Annual Staffing Plan requirements and the Merit Hiring Plan. SEA recommends that the final rule adopt a phased implementation with a transition year for the first ASP cycle, and that OPM identify or make available dedicated training funding for CHCOs and human resources staff, including through the revolving fund authorized at 5 U.S.C. 1304(e) and referenced in proposed § 250.102(b)-(c).

Recommendations

In summary, SEA asks that the final rule do the following.

1. Require an annual, agency-head-certified attestation confirming the CHCO has the visibility, oversight, and control the rule requires, reviewed as part of the Annual Staffing Review.
2. Require Annual Staffing Plans to explicitly address succession planning and leadership bench strength for the Senior Executive Service and other mission-critical positions.
3. Specify a minimum standing agenda allocation for workforce metrics within Quarterly Staffing Plan Performance Reviews conducted alongside existing 31 U.S.C. 1121(c) reviews.
4. Require Strategic Hiring Committees to solicit written input from the relevant career senior executive before acting on a hiring decision within that executive's program area.
5. Direct OPM to maintain a stable set of core, cross-administration human capital metrics alongside the President's Management Agenda.
6. Publish a bridge analysis between the retiring and incoming annual employee survey questions and add a question measuring perceived pathways into senior executive positions.
7. Adopt a phased implementation timeline, including a transition year for the first Annual Staffing Plan cycle, and identify dedicated training resources for CHCOs and human resources staff.

Conclusion

SEA supports OPM's effort to modernize strategic human capital management and to give agency leadership, and CHCOs in particular, the tools and accountability structures needed to manage the federal workforce well. Our recommendations are intended to ensure that streamlining the planning process strengthens the government's ability to build and sustain a strong, merit-based career civil service. As OPM finalizes this rule, SEA encourages the agency to ensure these reforms continue to uphold the merit system principles, transparency, and professional career leadership that have long been essential to an effective, trusted, and mission focused federal workforce. We appreciate the opportunity to comment and look forward to continuing to work with OPM as the rule is finalized.

Respectfully submitted,

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