Agency Guidance Biennial Review Submission for Executive Allocations FY 2028-2029



U.S. Office of Personnel Management

NOVEMBER 2026

Background

Every two years, under 5 U.S.C. 3133, the U.S. Office of Personnel Management (OPM) reviews the request of each agency for Senior Executive Service (SES) allocations, in consultation with the Office of Management and Budget (OMB), and authorizes, for each of the two subsequent fiscal years, a specific number of SES positions for each agency. Under 5 CFR 319.202, OPM also approves allocations for senior-level (SL) and scientific and professional (ST) positions. OPM encourages agencies to review their SL and ST needs through this same process. This process requires agencies to review organizational missions, plans, and structures, and to assess their effective and efficient use of executive resources. The process also allows OPM to effectively support agencies in their strategic efforts.

This review builds on OPM's November 24, 2025, memorandum, Call for Agency Review of Executive Allocations (2025 Executive Allocation Review). As part of the biennial review, agencies reported actual and planned position abolishments and proposed future SES, SL, and ST allocation levels associated with agency reorganization and workforce reshaping.

Through this process, OPM expects agencies to conduct a comprehensive agency-wide review and assessment of their current resources. Agency assessments must align executive resources with statutory responsibilities, Administration priorities, strategic plans, and available funding. Agencies must base requested allocation levels on anticipated mission requirements, program activities, and budget requests for FY 2028 and FY 2029. Agencies should evaluate the work that remains after restructuring and workforce reductions rather than assume that prior allocation levels remain necessary. Agencies should eliminate unnecessary management layers, reduce duplicative functions, consolidate administrative work where appropriate, and use process improvements and technology to improve service delivery.

OPM and OMB generally expect agencies to meet their FY 2028 and FY 2029 executive resource needs within existing allocations and to redirect or reduce allocations where warranted. Before seeking additional allocations, agencies must assess whether existing allocations and executive talent can meet the need through redistribution of responsibilities, redeployment of unused allocations, or appropriate SES reassignments. The review must address the effective utilization of existing SES, SL, and ST allocations, including whether unused allocations can meet priority needs; the disposition of reductions identified in the 2025 Executive Allocation Review; and whether executive positions are appropriately classified and if SES positions are appropriately designated.

Proposals should identify measurable improvements in service, productivity, cost, or decision-making and explain how executives will be accountable for results. These expectations reflect the Administration's emphasis on driving efficiency and aligning executive leadership with changing mission requirements. Each request will be reviewed based on anticipated program activities, budget requests, supporting evidence, and applicable

statutory requirements. Existing allocation levels and unused capacity will weigh heavily in OPM's review.

How to Use This Guidance

Use the table below to determine which steps apply to your agency. Follow the detailed instructions under each applicable step. Agencies must submit all responses through OPM Collect (collect.opm.gov). Emailed submissions will not be accepted. Appendix A provides general guidance for identifying SES, SL, and ST positions and applies to both steps.

Deadline	Submission	Required of
Thursday, December 31, 2026	**Step 1 - Agency Projections Form.** Complete the form directly in OPM Collect (FY 2028-FY2029 BIENNIAL REVIEW FOR EXECUTIVE ALLOCATIONS - PART 1).	All agencies
Friday, February 19, 2027	**Step 2 – Biennial Review of Executive Allocations - Agency Submission Workbook** (hereafter referred to as Agency Submission Workbook)**.** Upload the completed workbook in OPM Collect (FY 2028-FY2029 BIENNIAL REVIEW FOR EXECUTIVE ALLOCATIONS - PART 2).	Agencies requesting additional allocations, conversions between allocation types, or SES position redesignations, and agencies proposing to return allocations. Other agencies complete Step 2 only if directed by OPM.

Step 1 — Agency Projections Form

The Agency Projections Form establishes each agency's current executive allocation baseline and captures its plans and projected allocation needs for the FY 2028-2029 biennial review period. OPM will use Executive and Schedule C System (ESCS) data, along with Enterprise Human Resources Integration (EHRI) data, to validate the agency's current allocation baseline.

Completing the Agency Projections Form

Agencies must complete the Allocation Summary and Sections 1 – 3 form.

Allocation Summary

- Current Allocations and Position Designation**.** For each allocation type (SES, SL, and ST), agencies must report the current number of OPM-authorized allocations and the number currently filled based on employees onboard as of the date of the agency's response. Current authorized allocation totals must reflect any allocation reductions formally approved by OPM through the 2025 Executive Allocation Review.
- 2025 Executive Allocation Review. If planned reductions identified in the agency's submission did not result in a reduction to its authorized allocations, provide an update explaining why and indicate whether the agency still plans to request those reductions.

Section 1 – Projected Allocation Needs. Select one response indicating whether the agency intends to request additional SES, SL, or ST allocations as part of the FY 2028-2029 biennial review or will operate within its existing allocations during the biennial period. If additional allocations are anticipated, enter the projected number of additional SES, SL, or ST allocations. Enter 0 where none are projected.

Section 2 – Planned Changes to Existing Allocations. Indicate whether the agency intends to request: (1) additional reductions to existing SES, SL, or ST allocations beyond reductions previously identified through the 2025 review (if so, enter the number of additional reductions for each allocation type); (2) conversion of one or more existing allocations from one allocation type to another (e.g., SES to SL); or (3) redesignation of one or more existing SES positions from Career Reserved to General, or vice versa.

Section 3 – Agency Certification. The Strategic Hiring Committee must review the submission, and the Approving Official (Agency Head, Inspector General, or designee) must review and certify that the information provided accurately reflects the agency's current plans and projections for the FY 2028-2029 biennial review period. Agencies must provide the agency name, indicate whether the submission is for the parent agency or the agency's Office of the Inspector General, and provide the name and title of the Strategic Hiring Committee Chair and Approving Official and the name and email address of the primary agency point of contact. An alternate agency point of contact may also be provided.

Step 2 — Agency Submission Workbook

Following Step 1, the OPM Executive Resources Team will work with agencies completing Step 2 to identify the applicable submission requirements and assist them in completing the Agency Submission Workbook. Complete the applicable workbook sections for each proposed action using the instructions in this guidance and the workbook. Agencies proposing reductions must confirm those reductions by completing the applicable worksheet in the Agency Submission Workbook.

Requests for additional allocations must document position-specific mission needs, expected

outcomes, current and projected allocation utilization, alignment with workforce priorities, and available resources, together with an explanation of why existing capacity cannot meet the identified need. This guidance and the accompanying workbook specify the supporting information required for each action.

Agencies maintaining existing allocation levels without requests for additional allocations or proposed conversions, redesignations, reductions, or returns are not required to submit a Step 2 package unless directed by OPM. OPM may request additional information as necessary to evaluate a submission.

OPM Review of Existing Allocation Capacity

As part of OPM's review of requests for additional SES, SL, and ST allocations, OPM will assess whether agencies are effectively utilizing their existing executive allocation capacity, including whether unused allocations can meet priority needs. Prior allocation levels alone do not establish future requirements.

Agencies requesting additional allocations must identify the number of allocations requested for FY 2028 and FY 2029, the program activities and budget requests supporting the need, the Presidential priority or mission requirement served, and why existing capacity, including unused allocations, cannot meet the need. Proposed changes to Career Reserved designation must be identified by the position title and include a justification.

Where unused allocations exist, an agency requesting an increase must describe why those allocations cannot reasonably address the identified need. Agencies must use the Unused Allocations tab of the Agency Submission Workbook to report each unused SES, SL, or ST allocation, including planned disposition (retain and/or fill, or return to OPM), allocation status, recruitment status and actions taken, anticipated fill timeframe, and planned use and implementation. OPM asks for this information so that it can evaluate each request against the agency's actual use of the allocations it already holds, and can see whether those allocations are being recruited, are planned for a specific use, or are no longer needed and can be returned to OPM. Agencies requesting additional allocations should refer to the Unused Allocations tab in the Existing Allocation Capacity field of each request rather than repeating the data.

OMB Review of Agency Allocations

OMB may request supplemental information beyond what is required within the Agency Submission Workbook related to additional requests for allocations or its existing executive allocations.

Funding

Agencies should consult with their Chief Financial Officer, or equivalent official, before

submitting a request for additional allocations. The Cover Sheet certification requires the agency head or designee to certify that the agency's budget requests for fiscal years 2028 and 2029 include the funding needed for the requested allocations and that budget and funding implications have been addressed with the appropriate human capital, financial, and operational executives within the agency.

Completing the Agency Submission Workbook

Complete all tabs that apply to your submission. Fields marked 'enter' require agency input or verification. The Agency Submission Workbook automatically populates fields marked 'calculated'; do not edit those values.

Instructions: Summarizes the workbook's purpose, statutory basis, tab order, color legend, submission details, and priority guidance for additional allocation requests, and provides a guide to the position blocks and a column guide and disposition definitions for the Unused Allocations tab.

Cover Sheet (required for all submissions): Complete the following sections:

- **Agency Identification**. Agency name, submitting organization or component, if applicable, and date of submission.

- **Section I – Vacancy Rates**. Enter the as-of date and, for each of SES, SL, and ST, the number of allocations and the number filled. The workbook calculates each vacancy rate by dividing the number of vacant allocations by the total number of allocations (a type with zero allocations shows n/a, and a weighted total across all types is also shown). For example, if your agency has 10 total allocations, and 2 are vacant, your vacancy rate is 2 ÷ 10 = 0.2, or 20 percent.

  The disposition of vacant positions and the fill schedule by quarter is calculated from the Unused Allocations tab. Do not edit values.

- **Section II – New Allocation Request**. New allocation requests for FY 2028 and FY 2029 by allocation type, are calculated from the New Alloc tabs, including their continuation tabs). Do not edit values.

- **Section III – Converting Existing Allocation(s)**. Indicate whether the agency is converting existing allocations (yes/no). Enter the allocation type converted from and to and the number of allocations to convert. This information is checked against the Conversions tab.

- **Section IV – Requesting Redesignation of SES Positions**. Indicate whether the agency is requesting SES redesignations (yes/no). Enter the agency's Career Reserved floor, the number of Career Reserved positions, and the number of proposed redesignation

changes. This information is checked against the Redesignations tab.

- **Section V - Points of Contact**. Provide primary and alternate points of contact (name, title, email address, and phone number) and include the Strategic Hiring Committee name, title, and date of concurrence.

- **Section VI – Budget Certification and Authorization**. The Agency Head, Inspector General, or designee must review and certify the statement provided on the Cover Sheet. The certification confirms that the submission is accurate and complete, that the agency has conducted the review on which its request is based as required by 5 U.S.C. 3133, and that the agency's budget requests for fiscal years 2028 and 2029 include funding for any additional allocation requests, as required by OPM.

  Enter the certifying official's name and title in the designated field. By submitting the workbook, the agency confirms that the identified official has reviewed and certified the statement.

Unused Allocations: Report each unused SES, SL, or ST allocation, one allocation per row (up to 200 rows). Use the tab to explain unused allocations and plans for them. If an agency is returning an allocation to OPM, the remaining information on that row does not need to be completed, and OPM will formally notify the agency of its new allocation counts. Conversions are not a disposition option; document them on the Conversions tab. The Cover Sheet summarizes planned dispositions and the fill schedule by quarter from this tab. The column guide and disposition definitions follow.

Unused Allocations column guide:

- **Type** — SES, SL, or ST (dropdown).
- **Planned Disposition of Allocation** — Retain and/or fill, or Return to OPM (dropdown). Return to OPM covers allocations that are no longer needed. OPM will formally notify agencies of their new allocation counts.
- **Organizational Component** — The component, bureau, or office associated with the allocation. Enter "unassigned" if the allocation has not yet been assigned.
- **Allocation Status** — Select one (dropdown): Associated with an established vacant position; Intended for a position not yet established; or No specific position identified.
- **Position title** — The title of the position, if applicable. Enter "N/A" if no position has been established or identified.
- **ESCS Position Number** — The ESCS position number of the established position, if applicable.
- **Date position became vacant** — For an established vacant position, the date the position became vacant (mm/dd/yyyy). If the position has never been filled, enter "not

filled"; if no position has been established, enter "not applicable."

- **Days vacant** — Calculated from the "vacancy rates as of" date on the Cover Sheet and the date the position became vacant. Do not edit.
- **Recruitment Status and Actions Taken** — Select the current status (dropdown): Pre-Advertised, Advertised, Post Advertised, Post Approval, EOD Pending, Not under recruitment, Not applicable - no established position, or On hold.
- **USAJOBS Control Number** — If the position has been advertised, the control number of the current or most recent vacancy announcement.
- **Announcement closing date** — The closing date of that announcement.
- **Anticipated Fill Timeframe** — The fiscal year and quarter in which the position supported by the allocation is expected to be filled, FY28Q1 through FY29Q4, or Undetermined (dropdown). If undetermined or no fill is planned, explain in the planned use field. The Cover Sheet fill schedule counts Retain and/or fill allocations by quarter.
- **Planned use and implementation** — The intended use of the allocation and the actions planned over the next 12 months, including milestones and any funding, organizational, recruitment, or approval dependencies. If no specific use has been identified, explain the basis for retaining the allocation and when the disposition will be determined.
- **Supporting Reference** — A reference to any supporting document or source for the entry.

New Alloc - SES (complete only if requesting additional SES allocations): Complete one row for each proposed additional SES position. This tab accommodates positions 1-10; continuation tabs for positions 11–30 and 31–60.

For each proposed position, provide:

- **Position details**: title, component, proposed designation of Career Reserved or General, whether the organizational chart and position description are included.
- **Scope and scale**: enter the annual program budget the proposed position will oversee and supervisory responsibility.
- **Reason for request**: Identify the legislative or congressional mandate, executive order, new mission, program expansion, accretion of duties above GS-15, GAO report, or other basis.
- **SES functional criteria determination**: Identify the appropriate criteria.

This tab includes fields for checking completeness and recording decisions. Do not enter data into these columns.

Below the table, for each position, the required justification fields must be completed:

- **Program responsibilities and mission need**: Describe the program activities and responsibilities the proposed position would lead and the mission need or Presidential priority it would support. Explain the new or changed work driving the request.

- **Need for an additional allocation**: Building on the program activities and priority identified above, explain why an additional executive allocation is necessary. Describe changes that support this request, or explain why a continuing requirement cannot be met within existing allocation levels. Do not repeat information provided above.

- **Alternatives and efficiencies considered**: Describe the alternatives considered to requesting an additional allocation, including redirecting existing allocations, consolidating functions, or eliminating unnecessary management layers. Explain why the alternatives would not meet the identified need.

- **Existing allocation capacity**: Explain why existing allocations cannot meet this requirement. Identify unused allocations considered, their planned use, and why they cannot be redirected. Reference the Unused Allocations tab rather than repeating data.

- **Expected results and timing**: Identify the expected mission results, measures of success, and target timeframe. Explain the consequences if the allocation is not approved and provide the anticipated recruitment and filling dates. Quantify where practicable.

Organizational charts must be attached for each new allocation request, and position descriptions are *only* required for Career Reserved positions.

The Agency Submission Workbook accommodates up to 60 new SES allocation requests. If an agency is seeking more than 60 new SES allocations, contact OPM.

New Alloc - SL & ST (complete only if requesting additional SL or ST allocations): Complete one row for each proposed additional SL/ST position. This tab accommodates positions 1-10; continuation tabs for positions 11–30 and 31–60.

For each proposed position, provide:

- **Position details**: title, component, , whether the organizational chart and position description are included.

- **Reason for request**: Identify the legislative or congressional mandate, executive order, new mission, program expansion, accretion of duties above GS-15, GAO report, or

other basis.

This tab includes fields for checking completeness and recording decisions. Do not enter data into these columns.

Below the table, for each position, the required justification fields must be completed:

- **Program responsibilities and mission need**: Describe the program activities and responsibilities the proposed position would lead and the mission need or Presidential priority it would support. Explain the new or changed work driving the request.

- **Need for an additional allocation**: Building on the program activities and priority identified above, explain why an additional executive allocation is necessary. Describe changes that support this request, or explain why a continuing requirement cannot be met within existing allocation levels. Describe any other options considered for accomplishing the work, such as assigning it to existing positions or consolidating existing work, and explain why those options would not meet the identified need. Do not repeat information provided above.

- **Existing allocation capacity**: Explain why existing allocations cannot meet this requirement. Identify unused allocations considered, their planned use, and why they cannot be redirected. Reference the Unused Allocations tab rather than repeating data.

- **Expected results and timing**: Identify the expected mission results, measures of success, and target timeframe. Explain the consequences if the allocation is not approved and provide the anticipated recruitment and filling dates. Quantify where practicable.

Conversions (complete only if converting allocations): Enter one row per position (up to 75), including the current position type (SES, SL, or ST), the requested position type, the current position title, and the current ESCS position number. The number of positions listed rolls up to Cover Sheet Section III, where it is checked against the number of allocations to be converted.

Provide a separate justification for each request explaining the changes to the position's duties and responsibilities and demonstrating why the position meets the criteria for the proposed position type: for SES to SL, the duties are still above GS-15 but no longer meet any SES functional criterion under 5 U.S.C. 3132(a)(2)(A)–(E); for SES to ST, the position involves high-level research and development in the physical, biological, medical, or engineering sciences or a closely related field; and for SL or ST to SES, the duties now meet one or more SES functional criteria under 5 U.S.C. 3132(a)(2)(A)–(E).

The justification must also explain why the requested conversion is necessary and why the agency cannot meet the need using existing allocations of the requested type, including

vacant allocations elsewhere in the agency. Describe the alternatives considered to meet the need within those existing allocations and explain why they are insufficient. OPM may contact the agency for additional information to support its review.

Redesignations (complete only for SES positions being redesignated): Enter one row per position (up to 75), including the current designation, the requested designation (Career Reserved or General), the current position title, and the current ESCS position number (required).

Provide a separate justification for each request explaining the change in the position's duties or the office or component mission that necessitates the change and addressing the applicable designation criteria. For Career Reserved to General redesignations, agencies must demonstrate that the position does not meet the responsibilities criteria at 5 CFR 214.402, and must maintain the required minimum number of Career Reserved positions (the Career Reserved floor). *OPM will require position descriptions for each redesignation of a Career Reserved position*. Agencies should refer to 5 CFR 214.402 for specific required criteria and considerations.

For General to Career Reserved redesignations, the position must meet the criteria at 5 CFR 214.402, and the position description must be included in the submission. Changes in designation require the prior approval of OPM under 5 CFR 214.403. The number of positions listed rolls up to Cover Sheet Section IV, together with the agency's Career Reserved floor and number of Career Reserved positions.

Decisions, Data Accuracy, and Agency Assistance

OPM will notify agencies of allocation decisions by October 1, 2027.

Agencies must ensure that their ESCS records are current and accurate before submitting, as OPM will rely on ESCS and EHRI data in conducting its review. Even if allocations are not changing, agencies should use this opportunity to verify and update ESCS data as appropriate. Appendix A provides general guidance for identifying SES, SL, and ST positions.

For questions or comments, agency headquarters-level human resources offices may contact the OPM Executive Resources Team at allocation-management@opm.gov.

Component-level human resources offices must contact their agency headquarters for assistance. Employees must contact their agency human resources office for assistance.

Appendix A: Identifying SES, SL, and ST Positions

Agencies are responsible for determining the responsibilities, functions, classification, and organizational structure of their senior positions to ensure office/division/component/agency mission success. This includes identifying and deciding whether positions meet the Senior Executive Service (SES), Senior Level (SL), or Scientific and Professional (ST) criteria and establishing positions within authorized allocations.

The law and OPM regulations specify that SES, SL, and ST positions must be classifiable above the GS-15 level. This appendix provides general guidance to help establish cross-agency consistency in identifying SES, SL, and ST positions.

SES Functional Criteria

The SES was intended to be a corps of executives—not technical experts. The law at 5 U.S.C. 3132(a)(2) sets forth the criteria that characterize SES positions. Determining whether a position meets the criteria for placement in the SES cannot be done mechanically.

- The position must be classifiable above GS-15, or equivalent, based on the level of duties, responsibilities, and qualifications required by the job.
- The position must be evaluated as a whole and determined if it functions as a part of the management team, or as an independent advisor or technical expert.
    - In borderline cases, particular attention should be given to the position's qualification requirements and the impact these qualifications have on the position's duties and responsibilities. For example, a principal staff advisor should be placed in the SES if executive qualifications are critical to the successful performance of the position's duties and responsibilities.

Additionally, the position's duties must involve any of the following five activities. (5 U.S.C. 3132(a)(2)(A)-(E). Each of the five activities is followed by clarifying descriptions of what the activity involves.

(1) Directing the work of an organizational unit

- Assessing policy, program, and project feasibility;
- Determining program goals and developing implementation plans;
- Designing an organizational structure to promote effective work accomplishment; and

- Setting effectiveness, efficiency, productivity, and management/internal control standards.

(2) Accountability for the success of a program or project

- Obtaining the resources necessary to accomplish the program or project goals and assuming responsibility for their effective use; and
- Dealing with key officials from within and/or outside the agency to gain understanding and support for the program or project.

(3) Monitoring progress toward organizational goals and making appropriate adjustments to such goals

- Monitoring work status through formal and informal means to evaluate progress toward objectives;
- Assessing overall effectiveness, efficiency, and productivity of the organization; and
- Identifying, diagnosing, and consulting on problem areas related to implementation and goal achievement; and making decisions on alternative courses of action.

(4) Supervising the work of employees other than personal assistants

- Meeting minimum requirements for coverage under OPM's General Schedule Supervisory Guide (April 1998);
- Requiring accomplishment of work through combined technical and administrative direction of others;
- Constituting a major duty occupying at least 25 percent of the position time; and
- Meeting at least the lowest level of Factor 3 in the General Schedule Supervisory Guide based on the supervision of non-contractor personnel.

(5) Policy-making, , policy-determining functions, or other executive functions

- Reviewing staff recommendations on policies developed to affect the organization's mission;
- Considering political, social, economic, technical, and administrative factors with potential impact on recommended policies; and
- Approving policies affecting the organization's mission.

Note: In deciding whether an SES allocation must be designated as Career Reserved

(CR), agencies should review and must apply the criteria at 5 CFR 214.402. If an agency finds that the position does not meet those criteria (for example, the position need not be filled by a career appointee to ensure the impartiality, or the public's confidence in the impartiality, of the Government), it may designate the position as General.

Distinguishing between SES and SL/ST positions

Positions that are classifiable above the GS-15 level, but do not meet the SES functional criteria are placed in the Senior-Level (SL) system under 5 U.S.C. 5108, or in the Scientific and Professional (ST) system under 5 U.S.C. 3104, depending on the nature of the work. In an agency subject to the SES, a position classified above GS-15 that performs any SES function is established as an SES position, even if it also has research and development functions.

Senior-Level Positions (SL)

In agencies subject to the SES, positions in the SL system are classified above GS-15, but do not meet the executive criteria characteristic of the SES nor do they involve the fundamental research and development responsibilities that are characteristic of the ST pay system. (Note: Some SL positions meet SES executive criteria in certain agencies that are excluded from the SES.) SL positions are in the competitive service unless excepted by statute or OPM regulation.

Scientific and Professional Positions (ST)

Positions that are classifiable above the GS-15 level, but do not meet the SES functional criteria are appropriately placed in the ST system if they involve the performance of high-level research and development in the physical, biological, medical, or engineering sciences, or a closely related field. All ST positions are in the competitive service.

Research and development positions are characterized by the following features:

- Systematic investigation of theory, experimentation, or simulation of experiments;
- Application of the scientific method including exploring and defining problems, planning the approach and sequence of steps, executing experiments or studies, interpreting findings, and documenting or reporting findings; and
- Exercise of creativity and critical judgment, the variation in which may materially affect the nature of the end product.

The qualifications, stature, and contributions of an individual involved in research and

development have a direct and major impact on the level of difficulty and responsibility for the work performed. ST incumbents would be expected to possess a graduate degree, significant research experience, and a national or international reputation in their field. Typically, the incumbent of an ST position—

- Has authored fundamental papers in the field of expertise that are widely used and cited;
- Has received significant honors from major organizations for their accomplishments and contributions; and
- Is sought as an advisor and consultant on scientific and technological problems that extend beyond their specialty.

U.S. Office of Personnel Management

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