



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT
Washington, DC 20415

The Director

MEMORANDUM

TO: Heads and Acting Heads of Executive Departments and Independent Agencies, Inspectors General, and Council of the Inspectors General on Integrity and Efficiency

FROM: Scott Kupor, Director, U.S. Office of Personnel Management

DATE: April 28, 2026

RE: Exclusion of Schedule C and G General Schedule positions from Subchapter I of Chapter 43 of Title 5, United States Code: Performance Appraisal

The Office of Personnel Management (OPM) is excluding all employees in Schedule C and Schedule G General Schedule (GS) positions from the performance appraisal requirements under subchapter I of chapter 43 of title 5, United States Code. This action is taken under 5 U.S.C. 4301(2)(G) and 5 CFR 430.202(c) authorizing OPM to exclude positions or groups of positions in the excepted service. As a result of this exclusion, Schedule C and Schedule G GS employees are no longer covered by the performance appraisal provisions of 5 CFR part 430, subpart B, including requirements for performance standards, progress reviews, and annual ratings of record.

Under 5 U.S.C. 4302(a), agencies are generally required to establish performance appraisal systems to evaluate employee performance and inform personnel decisions such as rewarding, retaining, and removing employees. However, Schedule C and Schedule G GS employees serve in the excepted service under political appointments and thus are effectively “at-will” employees. As such, retention and removal actions for these employees do not depend on formal performance ratings. Additionally, due to the current administrative freeze on discretionary awards, bonuses, and similar payments for Federal employees serving under political appointments,¹ these employees are not eligible for performance awards or GS quality step increases. Based on these unique factors, OPM has determined that application of chapter 43 performance appraisal requirements to Schedule C and Schedule G GS employees is no longer appropriate or necessary.

Although Schedule C and Schedule G GS positions have been excluded from chapter 43 appraisal requirements, GS employees serving under these appointments remain eligible for within-grade increases (WGIs). Under 5 U.S.C. 5335, a WGI may be granted only upon a determination

¹ OPM, [Guidance on Freeze on Discretionary Awards, Bonuses, and Similar Payments for Federal Employees Serving under Political Appointments](#) (August 3, 2010).

that the employee's work is at an acceptable level of competence and when other statutory conditions are met. For employees not covered by chapter 43, agencies must establish procedures for making acceptable level of competence determinations based on performance appraisal requirements established by the agency, consistent with 5 CFR 531.409(b). These procedures are not subject to 5 CFR part 430, subpart B and agencies have discretion to design appraisal approaches that meet their needs for assessing this population.

If a Schedule C or Schedule G GS employee has completed the required waiting period but an acceptable level of competence determination has not been made, an agency may delay the determination in accordance with 5 CFR 531.409(c). This may include situations in which the employee has not had an adequate opportunity to demonstrate acceptable performance because he or she was not informed of the requirements for performance at an acceptable level of competence and has not received a recent performance rating. Once the employee's work is determined to be at an acceptable level of competence following the delay, the within-grade increase must be granted retroactively to the beginning of the pay period following completion of the required waiting period. See 5 CFR 531.409(c)(2).

If you or your staff have questions about the exemption or WGI requirements, please contact the following OPM policy teams:

Performance appraisal exemption: performance-management@opm.gov

WGI requirements: paypolicy@opm.gov

cc: Chief Human Capital Officers (CHCOs), Deputy CHCOs, and Human Resources Directors