Federal Performance Appraisal Systems: Regulatory Comparison Matrix

GS: 5 CFR 430, subpart B (91 FR 41521, July 7, 2026) | SP: 5 CFR 430, subpart E (91 FR 65904, Oct. 19, 2026) | SES: 5 CFR 430, subpart C (90 FR 44291, Sept. 15, 2025)

Provision	General Schedule (GS) 5 CFR 430, subpart B	Senior Professionals (SP) 5 CFR 430, subpart E	Senior Executive Service (SES) 5 CFR 430, subpart C
Summary Rating Levels & Patterns	• Three patterns retained; Level 2 eliminated: • Pattern A: Levels 1 & 3 (pass/fail) — seasonal, teachers, GS 1–4, and Federal Wage System (FWS) • Pattern B: Levels 1, 3, 5 • Pattern C: Levels 1, 3, 4, 5	• 5 summary levels: • Level 5: Outstanding • Level 4: Exceeds Fully Successful (Great) • Level 3: Fully Successful (Satisfactory) • Level 2: Minimally Satisfactory (Needs Improvement) • Level 1: Unacceptable	• 5 summary levels: • Level 5: Outstanding • Level 4: Exceeds Fully Successful (Great) • Level 3: Fully Successful (Satisfactory) • Level 2: Minimally Satisfactory (Needs Improvement) • Level 1: Unsatisfactory (Unacceptable)
Standardized Distribution & Calibration	Standardized Distribution – OPM authorized (§ 430.208(c)) No Performance Review Board (PRB) – rating caps enforced through calibration panels and system-level oversight Caps Levels 4 & 5 only; no low-end quotas; applied at aggregate agency level	Standardized Distribution – OPM authorized (§ 430.505(d)) PRB conducts calibration – reviews initial summary ratings and applies standardized distribution before ratings are finalized Current OPM guidance caps Levels 4 & 5 only; no low-end quotas; applied at aggregate agency level	Standardized Distribution – OPM authorized (§ 430.305(d)) PRB conducts calibration – reviews initial summary ratings and applies standardized distribution before ratings are finalized Current OPM guidance caps Levels 4 & 5 only; no low-end quotas; applied at aggregate agency level

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Appraisal System vs. Program	Both appraisal system AND program(s) required Programs operate under agency system per OPM regulations	Appraisal system only – no programs Programs eliminated; agency system governs its SP employees	Appraisal system only – no programs Consistent with longstanding SES framework
Performance Review Board (PRB)	Not applicable – no PRB requirement	Required for agencies with 10 or more SPs (§ 430.511) PRB reviews initial summary ratings; applies calibration; makes recommendations to the approving official Agencies with <10 SPs: PRB not required; approving official makes final determinations	Required for all agencies with SES (§ 430.311) PRB reviews and calibrates all SES ratings before finalization; primary internal review mechanism Membership requirements amended Sept. 2025 to remove DEI composition requirements
Higher-Level Review (HLR)	**ELIMINATED:** Mandatory HLR of Level 1 removed Agencies may establish internal review at their discretion; no regulatory requirement	**ELIMINATED:** Mandatory HLR of Level 1 removed Any SP may request HLR of any rating level (§ 430.509(f)(2)) Not limited to adverse ratings; available across all 5 levels on employee request	HLR remains available and unchanged for SES (§ 430.309(e)(2)) Consistent with longstanding SES framework

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Appraisal System Review & Certification	Biennial OPM certification (§ 430.210(b)) Unfavorable cert: OPM may recommend OMB limit aggregate awards; no impact on pay (unlike SP & SES)	Certification requirements unchanged (5 CFR 430, subpart D) Unfavorable cert: SP pay limited to Level III of the Executive Schedule; aggregate limit is Level I of the Executive Schedule	Certification requirements unchanged (5 CFR 430, subpart D) Unfavorable cert: SES pay limited to Level III of the Executive Schedule; aggregate limit is Level I of the Executive Schedule
Appealability & Grievance Rights	**ELIMINATED:** Challenging ratings of record through negotiated grievance procedures (§ 430.208(k)) Employees retain EEO, administrative grievances, MSPB for adverse actions	Ratings of record not appealable HLR available on request (§ 430.509(f)(2))	Annual summary ratings not appealable HLR available on request (§ 430.309(e)(2)) Consistent with longstanding SES framework
Progress Reviews & Min. Appraisal Period	Per OPM guidance – Check-ins can vary from monthly to quarterly Appraisal program sets a minimum period of performance that must be completed before a rating may be prepared (§ 430.207(a))	At least quarterly progress reviews (§ 430.507) 90-day minimum appraisal period (§ 430.504(b)(4))	Per OPM guidance – Quarterly progress reviews 90-day minimum appraisal period (§ 430.304(b)(4))
Supervisory Requirements	**NEW:** Supervisory critical element required for all supervisors (§ 430.206(b)(9)) Language provided by OPM; agencies may not modify	SPs are non-supervisory – no supervisory critical element	Performance plan includes executive/supervisory responsibilities Longstanding SES requirement

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Merit System Principles	**EXPRESSLY ADDED:** Agencies must administer systems consistent with merit system principles (§§ 430.209(g) & 430.210(c))	Merit system principles serve as an appraisal factor for evaluating SP performance (§ 430.508(d)(5)) Added in final rule	Merit system principles serve as an appraisal factor for evaluating SES performance (§ 430.308(d)(7)) Consistent with longstanding SES framework
Key Regulatory Terminology	"rating of record"; "summary level"; "appraisal program"	"initial summary rating" replaces "recommended rating" "rating official" replaces "supervisor"; "rating of record"; no "programs"	"initial summary rating"; "supervisor"; "appraisal system"; "annual summary rating"