

Reduction in Force (RIF) FAQs: Reemployment Priority List (“RPL”), Career Transition Assistance Plan (“CTAP”), and Interagency Career Transition Plan (“ICTAP”)

Conforming the reemployment and career transition programs to the revised RIF framework, transition coverage, and the new assessment requirement

Audience	Agency human resources, staffing and assessment specialists, career transition program coordinators, and counsel
Purpose	Explain the part 330 changes made by the RIF final rule, the transition-coverage phrase, and the assessment requirement for qualification determinations.
Primary citations	5 CFR 330.101, 330.202, 330.203, 330.206, 330.212, 330.213, 330.404, 330.602, 330.609, 330.702, 330.705, 330.707; 5 CFR 351.203, 351.702

These materials are implementation aids. The published Federal Register rule, the correction, the codified CFR, and applicable statutes control. Agencies should complete legal and labor-relations review before using the guidance in a specific RIF.

Scope, Effective Date, and What Did Not Change

1. What did the final rule change in RPL, CTAP, and ICTAP?

The rule conforms 5 CFR part 330 to the revised part 351 framework. It replaces the former tenure group I, II, and III references with the competitive service tenure subgroups I and II; adds transition coverage for another qualifying competitive service appointment, as determined by OPM; requires a job-analysis-based assessment in the RPL definition of qualified; converts the RPL numerical scoring method from job experience and education to assessed job-related skills; and revises and expands the exceptions to CTAP and ICTAP selection priority.

Regulatory references: 5 CFR 330.101, 330.202, 330.203, 330.206, 330.212, 330.213, 330.404, 330.602, 330.609, 330.702, 330.705, 330.707; 91 FR 49204-49206

2. When do the part 330 changes take effect?

September 2, 2026.

Regulatory references: 91 FR 49178 (Aug. 3, 2026); 91 FR 54794 (Aug. 25, 2026)

3. Does the rule reduce RPL, CTAP, or ICTAP placement rights?

No. OPM stated that the revisions preserve the core placement rights and selection priorities of all three plans. An agency must still place qualified RPL candidates in retention standing order and may not pass over a candidate with higher retention standing to select one with lower retention standing. An agency still may not place another candidate into a vacancy when an available CTAP selection priority candidate exists, and still may not appoint a candidate from outside its permanent competitive service workforce when an ICTAP selection priority candidate is available, unless a regulatory exception applies.

Regulatory references: 5 CFR 330.213(b), 330.705(a); 91 FR 49205

Eligibility and the Tenure-Group Conversion

4. How did the rule change RPL eligibility?

The eligibility provision now requires that the individual be serving in, or separated from, an appointment in the competitive service in the competitive service tenure group (or another qualifying competitive service appointment, as determined by OPM). The prior references to tenure group I or II are removed. The substantive effect is on who is inside the eligible group. Under the prior rule, an employee serving an initial probationary period was in tenure group II and could register for the RPL; under the revised definition that employee is outside the competitive service tenure group, as is an employee serving a temporary appointment of 1 year or less under 5 CFR part 316, subpart D. Nothing else about RPL eligibility changed.

Regulatory references: 5 CFR 330.203(a)(1), (b)(1); 351.203

5. How did the rule change CTAP eligibility?

Paragraph (1) of the definition of “displaced” and paragraph (1) of the definition of “surplus” now describe a current competitive service employee in the competitive service tenure group at grade GS-15 (or equivalent) or below (or another qualifying competitive service appointment, as determined by OPM). The excepted service categories within those definitions were not amended. The substantive effect is the same narrowing as for RPL: an employee serving an initial probationary period, formerly in tenure group II, is no longer within the competitive service category for CTAP purposes. The grade ceiling of GS-15 or equivalent and the requirement of a current rating of record of at least fully successful (Level 3) are unchanged, as are the qualifying events — a RIF separation notice, a notice of proposed removal for declining a directed geographic relocation, or a Certification of Expected Separation or comparable agency notice that the position is surplus.

Regulatory references: 5 CFR 330.602

6. How did the rule change ICTAP eligibility?

Within the definition of displaced, the introductory text of paragraphs (1) and (2) and all of paragraph (4) were revised to use the competitive service tenure group formulation with the same parenthetical. Paragraphs (3), (5), and (6), covering separations for compensable work-related injury or illness, Military Reserve and National Guard technicians receiving a special disability retirement annuity, and certain excepted service employees provided by law with both noncompetitive appointment eligibility and selection priority, were not amended. The substantive effect is again the narrowing of the covered group: an employee serving an initial probationary period, formerly in tenure group II, is no longer covered by those three paragraphs. The change is confined to the paragraphs that formerly read “career or career-conditional

(tenure group I or II),” because those were the only ones that turned on tenure group. The grade ceiling and the fully successful rating condition are unchanged.

Regulatory reference: 5 CFR 330.702

7. Does the new definition exclude employees serving an initial probationary period?

Yes. The competitive service tenure group consists of employees in the competitive service who, as of the date of the RIF notice, are not serving an initial probationary period or a temporary appointment of 1 year or less under 5 CFR part 316, subpart D. Under the prior rules those employees were generally placed in tenure group II.

Regulatory references: 5 CFR 351.203; 330.203, 330.602, 330.702; 91 FR 49204, 10920

8. What is “another qualifying competitive service appointment, as determined by OPM”?

This phrase appears in the RPL eligibility requirements, the CTAP definitions of ‘displaced’ and ‘surplus’, and the ICTAP definition of ‘displaced’. It is a transition-coverage device, not a new or open-ended eligibility category. It reaches only a competitive service appointment that qualified the individual for RPL, CTAP, or ICTAP coverage under the tenure-group definitions in effect before September 2, 2026, and that would cease to qualify solely because the rule replaced the former tenure group I or II formulation with the competitive service tenure group. In practice that is a narrow group: principally an individual who was in tenure group I or II when the qualifying event occurred but who would fall outside the competitive service tenure group today — most commonly a career-conditional employee serving an initial probationary period, who was in tenure group II under the prior rule. Its sole function is to keep the new definition from operating retroactively against an individual whose qualifying event occurred before the effective date.

The phrase adds nothing prospectively for a qualifying event that occurs on or after September 2, 2026. For those events, eligibility is determined by the new competitive service tenure group definition alone.

Note: The parenthetical appears only in the paragraphs where the rule replaced the former tenure-group phrase. It has no operation elsewhere in part 330.

Implementation note: Where an agency believes an individual's pre-effective-date appointment falls within this transition coverage, the agency should document the qualifying event and its date and seek an OPM determination rather than making the determination itself.

Regulatory references: 5 CFR 330.203(a)(1), (b)(1); 330.602; 330.702(1), (2), (4); 91 FR 49204-49205; 91 FR 10920-10921

9. May an agency use the phrase to extend coverage to an individual who was never eligible?

No. The phrase is limited to preserving coverage that already existed. Further, an appointment is qualifying only as determined by OPM, so an agency has no independent authority to designate an appointment as qualifying under this provision.

Regulatory references: 5 CFR 351.203; 330.203, 330.602, 330.702

10. How did the rule change the definition of the permanent competitive service workforce?

The definitions section for subpart A of Part 330 now defines permanent competitive service workforce and permanent competitive service employees as agency employees serving under career or career-conditional appointments in the competitive service tenure group, adds a definition of competitive service tenure group that takes its meaning from part 351 — under 5 CFR 351.203 that group is all employees in competitive service tenure subgroups I and II, meaning all employees in the competitive service who, as of the date of the RIF notice, are not serving an initial probationary period or a temporary appointment of 1 year or less under 5 CFR part 316, subpart D. This matters for ICTAP because the selection priority provision bars appointment of a candidate from outside that workforce when a selection priority candidate is available.

Regulatory references: 5 CFR 330.101(a); 330.705(a); 351.203

11. If an employee was demoted in an earlier RIF, what level of positions may the employee register for on the RPL?

The rule changed only the words used to describe the employee’s status, not the substance of the ceiling: the former phrase “tenure group I or II employee” was replaced with “competitive service tenure group employee.” An eligible who was demoted as a competitive service tenure group employee in a previous RIF may register for positions with a representative rate — the fourth step of the grade for a General Schedule position, the prevailing rate for a wage-system position, or the rate the agency designates as representative for a pay band or other position, as defined in 5 CFR 351.203 — up to the representative rate of the position held on a permanent appointment immediately before the RIF demotion was effective.

Regulatory reference: 5 CFR 330.206(b)(1)

12. What changed in 5 CFR 330.404, on preference eligibles in restricted positions when work is contracted out?

Section 330.404 sets out the additional responsibilities an agency and OPM have when the agency decides, in accordance with OMB Circular A-76, to contract out the work of a preference eligible who holds a restricted position. The provision was revised to conform to the competitive service tenure group terminology and to update an outdated reference to the “Government Printing Office,” now the Government Publishing Office.

Regulatory references: 5 CFR 330.404; 330.405, 330.406; 351.203

The Assessment Requirement

13. What is the new assessment requirement?

The RPL definition of qualified now requires that, in determining whether a registrant has the capacity, adaptability, and special skills needed to satisfactorily perform the duties and responsibilities of the vacancy for which the registrant is being considered, an agency must use an assessment that allows for demonstration of job-related skills, abilities, knowledge, and competencies; is based on a job analysis; and does not consist solely of, or principally rely on, an automated self-assessment.

Regulatory references: 5 CFR 330.202 (definition of “Qualified,” paragraph (5)); 351.702(a)(4)

14. Which programs does the codified assessment mandate apply to?

The codified text applies to the RPL provisions and in the RIF assignment-rights provision: the definition of qualified in subpart B, the RPL numerical scoring method, and 5 CFR 351.702(a)(4). The rule did not amend the CTAP provision on agency responsibilities for deciding who is well-qualified, or the ICTAP minimum criteria for the agency definition of well-qualified. A CTAP or ICTAP well-qualified determination therefore continues to be made under the agency's plan and, for ICTAP, under the minimum criteria in 5 CFR 330.704.

Note: OPM described the part 330 changes as strengthening the merit basis for RPL, CTAP, and ICTAP placement and as reducing overreliance on automated self-assessments. Agencies giving effect to that intent in CTAP and ICTAP should do so through their plans and their underlying assessment practices. Specifically, an agency should define and apply “well-qualified” in its CTAP and ICTAP plans using the same rigorous, job-analysis-based methods identified below — structured interviews, work-related exercises, custom or generic procedures for measuring an employee’s employment or career-related qualifications and interests, and structured resume reviews — and should discontinue the use of self-assessments as the basis for a CTAP or ICTAP well-qualified determination.

Regulatory references: 5 CFR 330.202, 330.213(c)(1), 330.605, 330.704; 351.702(a)(4); 91 FR 49204-49206

15. What assessment methods are acceptable?

Examples of acceptable assessment methods include: structured interviews; a work-related exercise; a custom or generic procedure for measuring an employee's employment or career-related qualifications and interests; a structured resume review; or another assessment, provided that the assessment demonstrates job-related technical skills, abilities, and knowledge and is relevant for the position for which the assessment is developed. The RIF assignment-rights provision lists the same examples.

Regulatory references: 5 CFR 330.202 (“Qualified,” paragraph (5)(iv)); 351.702(a)(4)(iv); 91 FR 54795

16. May an agency rely on an automated self-assessment?

No. The assessment may not consist solely of, or principally rely on, an automated self-assessment. A self-rated occupational questionnaire may be one input, but it cannot be the sole basis for the qualification determination.

Regulatory references: 5 CFR 330.202 (“Qualified,” paragraph (5)(iii)); 351.702(a)(4)(iii); 330.213(c)(1)

17. Does the five-year past-performance exception in the RIF rules apply to an RPL qualification determination?

No. The RIF assignment-rights provision excuses a new assessment where, during the 5-year period ending on the date the employee receives a specific RIF notice, the employee occupied the same position, or a position at the same grade or pay level with substantially the same duties, occupational series, qualification requirements, and conditions of employment, and received a rating of record of Level 3, Fully Successful, or higher, or the equivalent, for performance of those duties. The part 330 definition of qualified contains no counterpart. OPM aligned the part 330 definition of qualified with 5 CFR 351.702 in the proposed rule, and added the five-year exception only in the final rule and only to 351.702. The reason for the exception is RIF-specific: a new assessment is unnecessary where official records already show that the employee recently and successfully performed the same or substantially equivalent work. By contrast, an RPL registrant is applying for a vacancy rather than being released from a competitive level.

Implementation note: If an agency concludes that recent identical work should reduce assessment burden for RPL, it should address that through the assessment design and job analysis, not through an unwritten exception.

Regulatory references: 5 CFR 351.702(a)(4)(v); 330.202

18. What other requirements must a qualified RPL registrant satisfy?

A registrant must meet any other applicable requirements for competitive service appointment, including employment suitability requirements under 5 CFR part 731.

Regulatory reference: 5 CFR 330.202 ("Qualified," paragraph (6))

19. How did the rule change RPL selection under the numerical scoring method?

The agency now scores assessed skills. Under the numerical scoring method, the agency must rate RPL placement priority candidates on their job-related skills, abilities, knowledge, and competencies, as measured by an assessment.

That assessment must be based on a job analysis. It also may not "principally rely on" a self-assessment from an automated examination.

The agency must rate and rank candidates in a fair and consistent manner. It then assigns each candidate a numerical score of at least 70 on a scale of 100, using the evaluation criteria it develops under that paragraph. On top of that score, the agency must grant 5 additional points to preference eligibles under 5 U.S.C. 2108(3)(A) and (B), and 10 additional points to preference eligibles under 5 U.S.C. 2108(3)(C) through (G).

Implementation note: The 5-point and 10-point additions in the RPL scoring method follow the competitive examining convention. They are not the 3-point and 5-point veterans' preference augmentations used in RIF retention standing under 5 CFR 351.504. Do not carry one set of values into the other calculation.

Regulatory references: 5 CFR 330.213(c)(1); 5 U.S.C. 2108(3); compare 5 CFR 351.504(a)

20. What are the two RPL selection methods, and how do they differ?

The two methods are alternatives. For a given vacancy, the agency uses either the retention standing method or the numerical scoring method.

Under the retention standing method, the agency must place qualified RPL placement priority candidates in order of retention standing, determined in accordance with part 351. The agency may not pass over a candidate with higher retention standing.

The numerical scoring method is the alternative to that ordering.

The revised part 351 changed what retention standing order reflects. Retention standing is now performance-first: performance credit as augmented by veterans' preference, with tenure subgroup and actual service computation date as tiebreakers.

Regulatory references: 5 CFR 330.213(b)-(c); 351.501-.505

21. Did the rule change agency flexibility to modify a qualification standard?

Yes, it simplified the provision. An agency may modify the OPM or OPM-approved qualification standard used to determine if an RPL eligible is qualified for a position, provided the exception is applied consistently and equitably. The capacity, adaptability, and special skills language moved out of this provision and into the

definition of qualified, and the minimum-education reference was removed, consistent with the Federal government's move away from unnecessary educational requirements.

Regulatory references: 5 CFR 330.212(c)(1); 330.202; 91 FR 10920

22. How much time should an RPL eligible be given to take an assessment the agency administers?

The regulation does not prescribe a time frame. The agency should establish a reasonable, consistently applied response or testing period that accounts for the assessment method, the vacancy or notice schedule, accessibility, and the need for reasonable accommodation. The administrative record should show when the individual received instructions and when the assessment closed.

Regulatory references: 5 CFR 330.202; 330.213; applicable reasonable-accommodation requirements

Exceptions to CTAP and ICTAP Selection Priority

23. What changed in the CTAP selection priority exceptions?

CTAP selection priority exceptions are the personnel actions listed in 5 CFR 330.609 that an agency may take even when a well-qualified CTAP selection priority candidate is available for the vacancy. The rule revised four of those paragraphs and added one. The conversion exception in paragraph (e), which permits an agency to convert an employee already on board under an appointment carrying noncompetitive conversion eligibility into a competitive service appointment without first clearing CTAP priority, was restated to cover conversions from a Veterans Recruitment Appointment under part 307; an appointment under 5 U.S.C. 3112 and part 316 of a veteran with a compensable service-connected disability of 30 percent or more; an excepted service appointment under part 213; and a post-secondary student appointment under 5 U.S.C. 3116 and part 316, subpart I. Other revised paragraphs cover a transfer or position change under part 412; conversion of a time-limited appointment in the competitive or excepted service to a permanent competitive service appointment where the employee accepted the time-limited appointment while a CTAP eligible; and an appointment using the post-secondary student hiring authority. The new paragraph permits an agency to retain, or finalize the appointment of, an employee serving a probationary period pursuant to 5 CFR 11.2.

Regulatory references: 5 CFR 330.609(e), (dd), (ee), (gg), (hh); 91 FR 49217, 54794-54795

24. What changed in the ICTAP selection priority exceptions?

Four paragraphs were revised or added: a transfer or position change of an employee under part 412; retaining, or finalizing the appointment of, an employee serving a probationary period pursuant to 5 CFR 11.2; an appointment using the college graduate hiring authority under 5 U.S.C. 3115 and part 315; and an appointment using the post-secondary student hiring authority under 5 U.S.C. 3116 and part 316, subpart I. The selection priority provision itself was revised to state that an agency must not appoint any candidate from outside its permanent competitive service workforce into a vacancy if there is an ICTAP selection priority candidate available, unless the personnel action is an exception.

Regulatory references: 5 CFR 330.705(a); 330.707(v)-(y); 91 FR 49217-49218, 54795

25. Why do the probationary exceptions refer to probationary periods but not trial periods?

CTAP and ICTAP apply only to filling vacancies in the competitive service, and trial periods under Civil Service Rule 11 apply only to excepted service employees, so there was no need to identify finalizing an excepted service appointment as an exception to CTAP or ICTAP selection priority.

Regulatory references: 5 CFR 330.609(hh), 330.707(w); 5 CFR 11.2, 11.3; 91 FR 49206

26. Does the probationary exception allow an agency to bypass a CTAP or ICTAP candidate generally?

No. It authorizes only the specific action described, namely retaining, or finalizing the appointment of, an employee already serving a probationary period under 5 CFR 11.2. It is not authority to fill a vacancy from outside the permanent competitive service workforce and does not apply to a new appointment.

Regulatory references: 5 CFR 330.609(hh); 330.707(w); 330.705(a)