



March 2025

FEDERAL WORKFORCE

OPM Needs to Take Additional Actions to Improve the Federal Early Career Talent Pipeline

GAO Highlights

Highlights of [GAO-25-106658](#), a report to congressional requesters

Why GAO Did This Study

Pathways Programs (Pathways) can provide an early career pipeline for students and recent graduates to the federal government. According to the Office of Personnel Management (OPM), Pathways are the primary vehicle for recruiting and placing students and recent graduates into federal internship and fellowship positions.

GAO was asked to review federal internship programs. This report examines the extent to which OPM has (1) increased internship and fellowship opportunities through Pathways, (2) collected information on any challenges from agencies and participants that could be used to improve Pathways, and (3) established a lessons-learned process for recruitment and outreach. GAO reviewed federal statutes, regulations, and guidance on Pathways. GAO also analyzed OPM data on Pathways hires from fiscal years 2013 to 2023—the most recent years of data—to identify demographic and other information on Pathways hires. GAO also interviewed OPM officials and organizations knowledgeable about students' advancement to obtain their views on OPM's efforts to increase internships and fellowships through Pathways.

What GAO Recommends

GAO recommends that OPM develop and implement plans to collect and assess evidence to understand Pathways hiring trends, collect and evaluate feedback data from Pathways participants, and collect and share lessons learned associated with recruitment and outreach for Pathways. OPM concurred with all three recommendations.

For more information, contact Dawn G. Locke at (202) 512-6806 or locked@gao.gov.

March 2025

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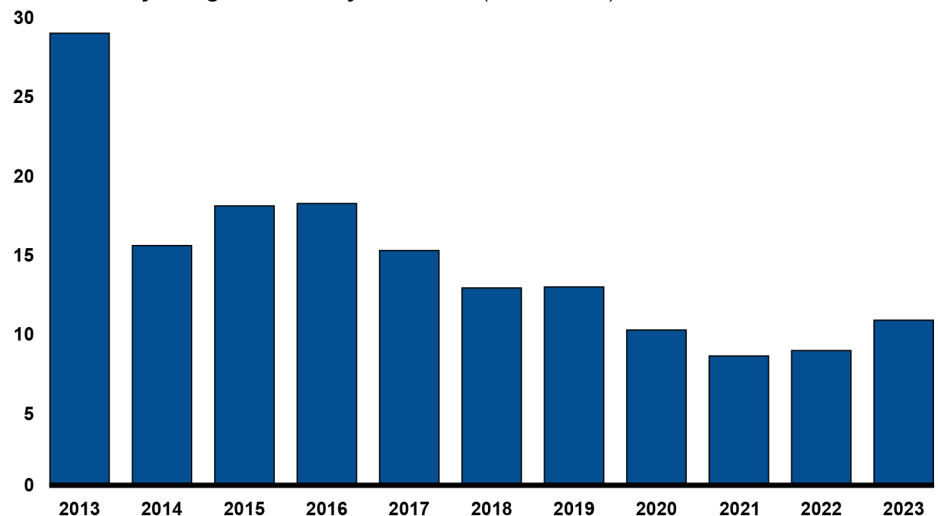
OPM Needs to Take Additional Actions to Improve the Federal Early Career Talent Pipeline

What GAO Found

When it was established in 2010, Pathways consisted of (1) an internship program for current students, (2) a recent graduates program, and (3) the Presidential Management Fellows (PMF) program for individuals who obtained advanced degrees within the preceding 2 years. On Feb. 19, 2025, President Trump signed Executive Order (EO) 14217, which began the process of terminating the PMF program. The EO did not address the internship or recent graduates program that remain part of Pathways and include the majority of program participants.

GAO's analysis of OPM's data found that the overall hiring trend has shown a 64 percent decrease since the implementation of the programs in fiscal year 2013 but has fluctuated within that timeframe. OPM has analyzed and reported on hiring trends. But OPM has not determined the information needed to identify factors that impact hiring trends or developed a plan to collect and assess that information, which would better position it to understand hiring fluctuations.

Total Pathways Programs Hires by Fiscal Year (in thousands)



Source: GAO analysis of Enterprise Human Resources Integration data. | GAO-25-106658

While OPM has taken steps to collect feedback from agencies on the challenges of Pathways, it did not collect feedback from its participants. Without a plan to collect and evaluate feedback data from all participants, OPM is unable to determine whether participants are satisfied with the programs or faced challenges.

OPM has not established a lessons-learned process for Pathways. OPM identified agency successes in recruitment and outreach that may be used to improve Pathways hiring. Although OPM meets with agency officials about using Pathways, agencies continue to request additional information on making Pathways more effective. Without a process in place to collect and share lessons learned, OPM is missing an opportunity to leverage stakeholders' knowledge to improve the government's ability to recruit, hire, retain, and manage its early career talent pipeline.

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Abbreviations

| | |
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| CHCO | Chief Human Capital Officers |
| DHA | Direct hire authority |
| EHRI | Enterprise Human Resources Integration |
| EO | Executive Order |
| HBCU | Historically Black Colleges and Universities |
| OPM | Office of Personnel Management |
| Pathways | Pathways Programs |
| PMF | Presidential Management Fellows |
| PPO | Pathways Programs Officer |

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March 20, 2025

The Honorable Gerald E. Connolly
Ranking Member
Committee on Oversight and Government Reform
House of Representatives

The Honorable Jamie Raskin
House of Representatives

The federal government faces long-standing challenges in managing its workforce, including ensuring that its future employees have the skills to address current and emerging demands in areas such as cybersecurity, acquisition management, and use of artificial intelligence. Since 2001, we have identified the management of the federal workforce as a high-risk area because of the challenges agencies face to fill mission-critical skills gaps.¹ Agencies can use an important strategy to fill these gaps—developing and maintaining a pipeline of individuals with critical skills who will apply for federal internship and fellowship positions.

We previously reported that internships can help to establish a pipeline for recruitment in the federal government.² Established by Executive Order (EO) 13562 in 2010, the federal government’s Pathways Programs (Pathways) was designed to improve the competitiveness of federal recruiting and promote federal employment opportunities for students and recent graduates. Pathways provides distinct paths to federal internships and potential careers in the government.³

¹A skills gap may consist of one or both of the following: (1) a staffing gap, in which an agency has an insufficient number of individuals to complete its work; or (2) a competency gap, in which an agency has individuals without the appropriate skills, abilities, or behaviors to successfully perform the work. See GAO, *Federal Workforce: OPM Advances Efforts to Close Government-wide Skills Gaps but Needs a Plan to Improve Its Own Capacity*, [GAO-23-105528](#) (Washington, D.C.: Feb. 27, 2023).

²GAO, *Federal Workforce: Talent Management Strategies to Help Agencies Better Compete in a Tight Labor Market*, [GAO-19-723T](#) (Washington, D.C.: Sep. 25, 2019).

³Executive Order 13562. *Recruiting and Hiring Students and Recent Graduates*, 75 Fed. Reg. 82585 (Dec. 30, 2010). The Office of Personnel Management issued regulations implementing Pathways in May 2012 and amended those regulations in April 2024. See 77 Fed. Reg. 28194 (May 11, 2012); 89 Fed. Reg. 25751 (Apr. 12, 2024).

At the time we did our work, Pathways consisted of three programs—(1) the internship program for current students, (2) the recent graduates program for individuals who received a degree or certificate from a qualifying institution or completed a qualifying career or education program within the last 2 years, and (3) the Presidential Management Fellows (PMF) program for individuals who obtained advanced degrees within the preceding 2 years. On February 19, 2025, President Trump signed EO 14217, which commenced the process of terminating the PMF program.⁴

You asked us to review federal internship programs. This report examines the Pathways Programs as they existed prior to the issuance of EO 14217, specifically the extent to which the Office of Personnel Management (OPM) has (1) increased internship and fellowship opportunities through Pathways, (2) collected information on any challenges from agencies and participants that could be used to improve Pathways, and (3) established a lessons-learned process for recruitment and outreach.

To address the first objective, we examined federal laws, regulations, and the EO related to Pathways hiring. We also reviewed OPM guidance and our related past reports on the federal workforce. We compared OPM's efforts to increase Pathways opportunities to criteria we identified in prior work on effectively implementing federal evidence-building and performance-management activities. We interviewed officials from OPM and the Chief Human Capital Officers (CHCO) Council, and organizations knowledgeable about college and university students' advancement—the Hispanic Association of Colleges and Universities and the White House initiative for Historically Black Colleges and Universities (HBCU)—to obtain their views on the status of OPM's activities to increase internships and fellowships through Pathways.

We also analyzed data on Pathways hires from fiscal year 2013 (the first full fiscal year after the programs were implemented) to fiscal year 2023 (the most recent fiscal year of available data) from OPM's Enterprise Human Resources Integration (EHRI) database to identify demographic

⁴Exec. Order 14217, *Commencing the Reduction of the Federal Bureaucracy*, 90 Fed. Reg. 10577 (Feb. 25, 2025). The EO directed OPM initiate the process to withdraw the regulations implementing the PMF program and amended EO 13562 to remove references to PMF, upon the effective date of OPM's final rule. EO 14217 did not address the internship or recent graduates program, so those programs continue to be part of Pathways.

and other information on the hires.⁵ We used EHRI’s “legal authority” and “nature of action” codes to identify the hiring authorities that agencies used for Pathways hires. We assessed the reliability of OPM’s EHRI data sets and data elements by performing electronic testing, reviewing existing information about the data and the system that produced them, and verifying information with agency officials knowledgeable about the data. We determined these data to be sufficiently reliable for our purposes.

To address the second objective, we reviewed our related past reports on the federal workforce as well as related OPM guidance and documentation on Pathways. We interviewed OPM officials responsible for each of the three Pathways Programs and their efforts to collect information from relevant stakeholders on their experiences with Pathways. We also interviewed CHCO officials on their efforts to provide OPM with feedback on ways to improve Pathways. We compared OPM efforts to collect feedback from Pathways agencies and participants to EO 13562, which created Pathways and directed OPM to develop plans to evaluate agencies’ effectiveness in recruiting and retaining talent using Pathways and the satisfaction of participants.

To address the third objective, we reviewed our related past reports on the federal workforce and lessons learned, reviewed OPM guidance and documentation on recruitment and outreach, and interviewed OPM officials to learn about their experiences with recruiting and outreach efforts for Pathways, including any lessons learned. We compared OPM’s efforts to criteria for creating a lessons-learned process. See appendix I for additional information about our scope and methodology.

We conducted this performance audit from February 2023 to March 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁵EHRI is the primary government-wide source for information on federal employees. The EHRI data we analyzed cover most executive branch civilian employees and some legislative and judicial branch employees but do not cover the U.S. Postal Service or intelligence agencies.

Background

Pathways was established through EO 13562 in 2010 to improve efforts by federal agencies to recruit and hire students and recent graduates. Pathways replaced three former internship programs and incorporated the PMF program as part of Pathways.⁶ According to OPM officials, Pathways is the primary vehicle for early career employees that lead to permanent positions in the federal government and is widely used by federal agencies to fill internship and fellowship positions.⁷

Excepted service hiring authorities enable agencies to hire when it is not feasible or not practical to use traditional competitive hiring procedures and can result in a more streamlined hiring process. Pathways positions are part of the excepted service and therefore not subject to the competitive examination process. As such, Pathways is intended to be used as a supplement to, not a substitute for, the competitive hiring process. The EO creating Pathways authorized OPM to implement the program via regulations, which were first promulgated and issued in 2012.⁸ Additionally, the EO assigned OPM oversight responsibility for the programs.

OPM revised and amended the Pathways regulation in April 2024 to better recruit and retain early career talent in the federal government.⁹ The regulation's revisions included such changes as:

- Expanding the time frame for converting Pathways interns to positions in the competitive service from 120 to 180 days.
- Allowing participants in the recent graduate program and the PMF program to be converted to term or permanent positions in any agency rather than in their current agency, when appropriate.
- Removing the requirement for agencies to execute a memorandum of understanding with OPM and replacing it with the requirement for

⁶Exec. Order 13562, *Recruiting and Hiring Students and Recent Graduates*. 75 Fed. Reg. 82585 (Dec. 30, 2010). EO 13562 established Schedule D, an excepted service hiring authority, to cover Pathways appointments. See 5 C.F.R. part 213, subpart D and 5 C.F.R. part 362.

⁷In addition to Pathways, which extends recruiting and hiring of internship opportunities government-wide, some agencies have their own internship programs to recruit interns based on their hiring needs. These non-Pathways internship programs are outside the scope of this report.

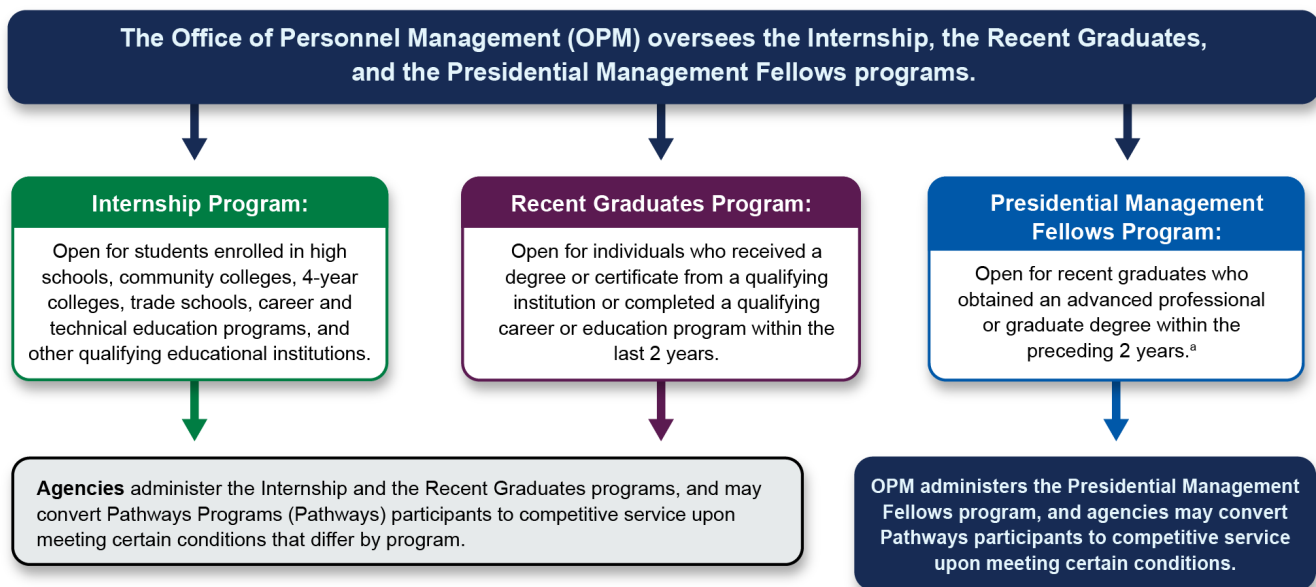
⁸77 Fed. 28194 (May 11, 2012).

⁹89 Fed. Reg. 25751 (Apr. 12, 2024).

agencies to establish a Pathways Policy before using the Pathways hiring authorities.¹⁰

At the time we did our work, OPM oversaw all three Pathways programs—internship, recent graduates, and PMF (see fig. 1).

Figure 1: Office of Personnel Management (OPM) Oversight of Pathways Programs Prior to February 19, 2025



Source: GAO analysis of OPM documents. | GAO-25-106658

^aAn advanced professional or graduate degree is defined as a masters, professional (for example, law), doctorate, or other formal degree pursued after completing a bachelor's degree.

Note: Exec. Order 14217, *Commencing the Reduction of the Federal Bureaucracy*, 90 Fed. Reg. 10577 (Feb. 25, 2025), directed the Office of Personnel Management (OPM) initiate the process to withdraw the regulations implementing the Presidential Management Fellows (PMF) program and amended EO 13562 to remove references to PMF, upon the effective date of OPM's final rule.

¹⁰Agencies must be in full compliance with the Pathways final rule no later than December 9, 2024. 89 Fed. Reg. 25751 (Apr. 12, 2024).

OPM Has Taken Steps to Increase Pathways Hiring, but Has Not Identified Factors That Impact Hiring

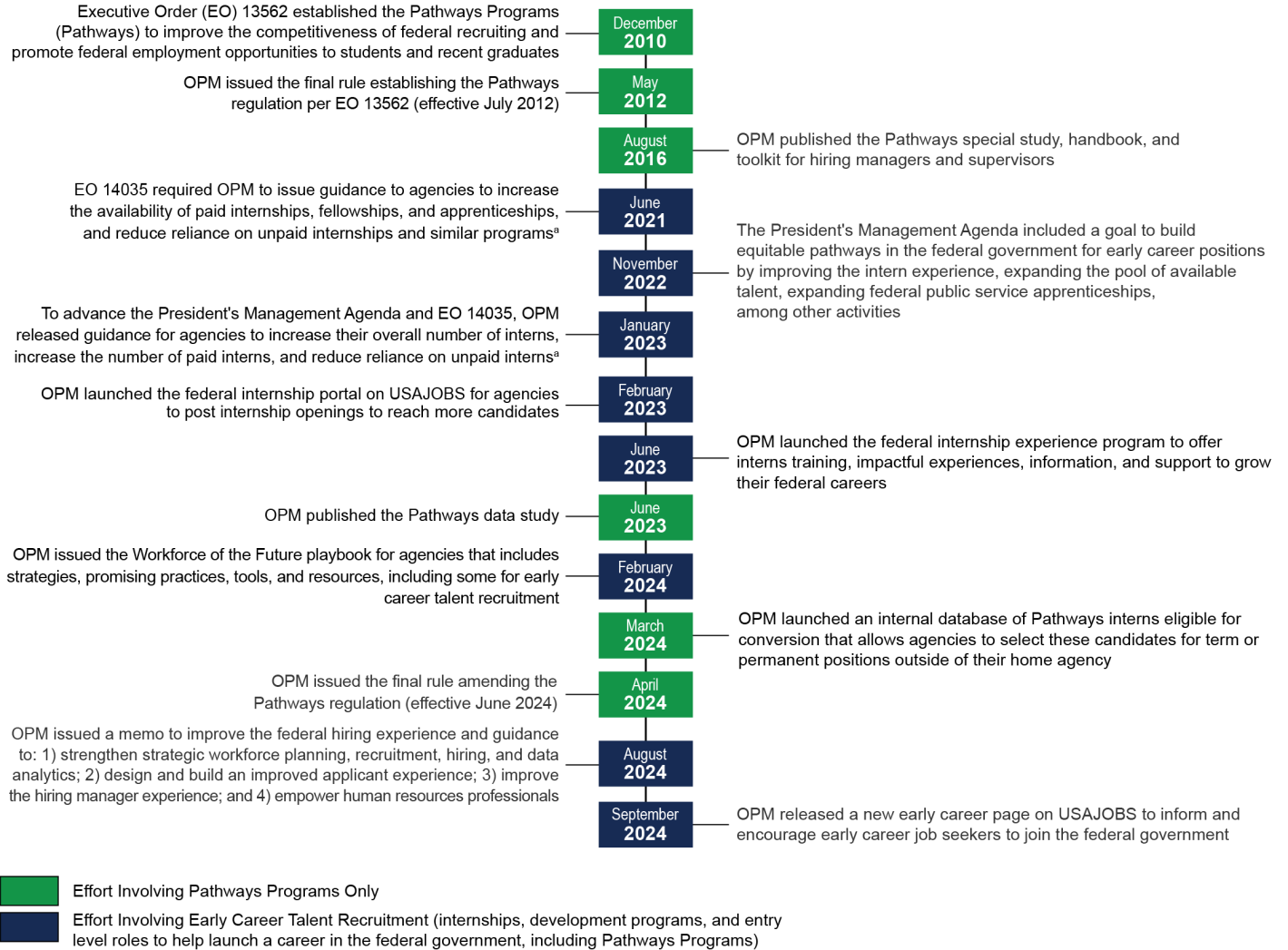
OPM has taken steps to improve Pathways hiring. OPM attributes the increase in the Pathways hires from fiscal years 2021 through 2023 to its efforts. However, the total number of Pathways hires in fiscal year 2023 (10,200) is below the number in fiscal year 2013 (28,422). While OPM has analyzed and reported on hiring trends, OPM has not developed a plan to identify factors that impact Pathways hiring.

OPM Reports Its Recent Actions Reversed Hiring Declines

According to OPM, recent efforts it undertook to improve Pathways and early career talent recruitment and hiring resulted in an increase in Pathways hiring (see fig. 2). Specifically, OPM has focused its efforts to increase internships in response to the 2022 President's Management Agenda goal—to strengthen and empower the federal workforce.¹¹ These efforts included providing policy, guidance, technical assistance, and resources to agencies. In addition, according to OPM, it has engaged with senior leaders government-wide in various forums to share data trends and internship best practices in an effort to improve hiring outcomes for Pathways and internships across the government.

¹¹The President's Management Agenda identifies an administration's key management reform priorities and initiatives for improving the ability of agencies to deliver mission outcomes, provide excellent service, and effectively steward taxpayer dollars on behalf of the American people over time. It also communicates and organizes goals, objectives, and implementation strategies for reform priorities and initiatives across the federal government.

Figure 2: Key Office of Personnel Management (OPM) Efforts Involving Pathways Programs Only and Early Career Talent Recruitment, Fiscal Years 2011 Through 2024



Source: GAO summaries of relevant executive orders and other executive actions. | GAO-25-106658

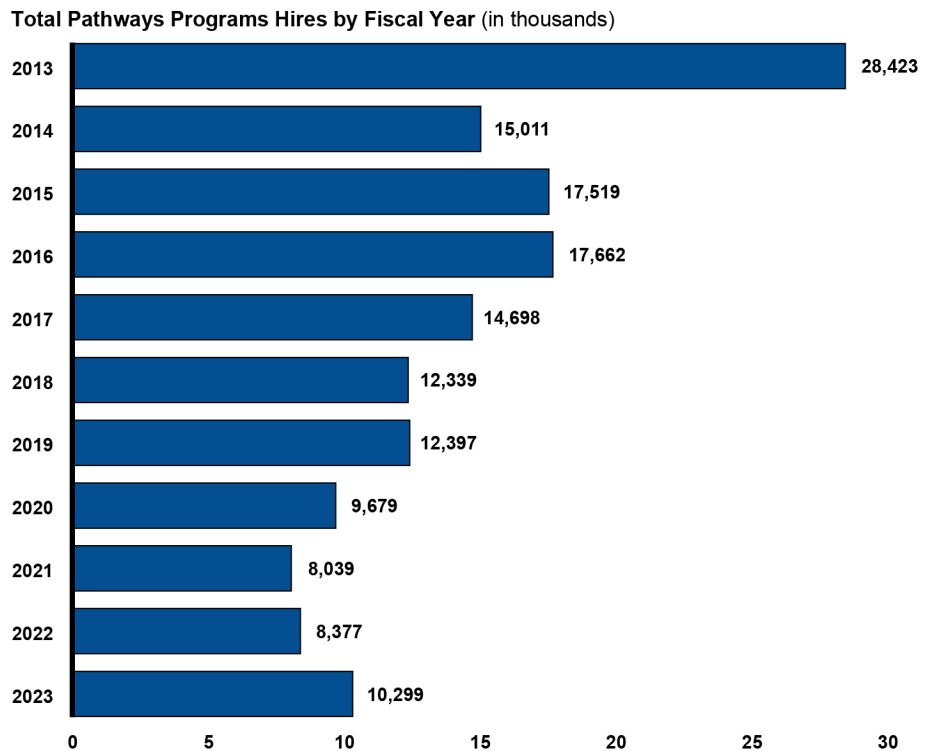
^aEO 14035 was rescinded as of January 20, 2025. See Executive Order 14148, *Initial Rescissions of Harmful Executive Orders and Actions*, 90 Fed. Reg. 8237 (Jan. 28, 2025).

Note: Exec. Order 14217, *Commencing the Reduction of the Federal Bureaucracy*, 90 Fed. Reg. 10577 (Feb. 25, 2025), directed the Office of Personnel Management (OPM) initiate the process to withdraw the regulations implementing the Presidential Management Fellows (PMF) program and amended EO 13562 to remove references to PMF, upon the effective date of OPM's final rule.

Our analysis of OPM's EHRI data found that the total number of Pathways hires decreased by 64 percent over the past 11 years (between

fiscal year 2013, the first full fiscal year after the programs were implemented, through fiscal year 2023, the most recent fiscal year of available data) despite a recent hiring increase (see fig. 3).¹² The number of Pathways hires increased by 28 percent from 8,039 in fiscal year 2021 to 10,299 in fiscal year 2023. While OPM officials were not certain what led to the decreases starting in fiscal year 2014, OPM officials attributed the recent increase in Pathways hiring to efforts such as the launch of the federal internship portal and the federal internship experience program. See appendix II for the results of our EHRI data analysis on the demographic and other characteristics of Pathways hires.

Figure 3: Total Pathways Programs Hires for Fiscal Years 2013 Through 2023



Source: GAO analysis of Enterprise Human Resources Integration data. | GAO-25-106658

¹²Fiscal year 2023 was the most recent fiscal year of available EHRI data.

OPM Has Reported on Hiring Trends, but Has Not Developed an Evidence-Building Implementation Plan to Identify Factors that Impact Pathways Hiring

While OPM has reported on a number of efforts to analyze Pathways data, such efforts have not resulted in OPM identifying factors that impacted the increase or decrease in Pathways hiring trends.

OPM has produced two studies specific to Pathways. The first study in August 2016 assessed Pathways use and effectiveness 2 years after its implementation.¹³ The second study, conducted in June 2023, compared EHRI Pathways hiring data from fiscal year 2014 with hiring data from fiscal year 2021 at 16 selected agencies to identify any significant changes or trends.¹⁴ In this second study, OPM reported, among other things:

- Ten of the agencies included in the study decreased their use of Pathways, while six agencies increased their use.¹⁵
- Agencies in the sample increased their use of agency-specific direct hire authorities (DHAs) by 230 percent.¹⁶ OPM officials did not analyze for which positions the DHAs were used. OPM's study stated that DHAs cater to agencies' need to build a talent-ready workforce to face immediate challenges and can therefore be more beneficial than Pathways. Specifically, OPM stated that while agencies can use Pathways to create pipelines of future talent, DHAs are beneficial when agencies need to hire faster, or to hire experienced candidates who can hit the ground running.
- Department of Defense agencies had notable declines in Pathways hiring. Specifically, the Navy saw the largest decline of 91 percent.

¹³Office of Personnel Management, *The Pathways Programs: Their Use and Effectiveness Two Years After Implementation, Fiscal Year 2016* (Washington, D.C.: August 2016).

¹⁴Office of Personnel Management, Merit System Accountability and Compliance, Agency Compliance and Evaluation, *2023 Pathways Data Study: June 2023* (Washington, D.C.: June 2023).

¹⁵OPM listed the Department of Agriculture (USDA) as one of six agencies that increased its use of Pathways but did not include the other five. The study attributed the USDA's increased use to its commitment to using Pathways in meeting its strategic hiring goals. However, we found that OPM did not analyze the USDA's efforts or the impact such efforts may have had on the increase in Pathways.

¹⁶Agencies use direct hire authority to hire when a critical hiring need or a severe shortage of candidates exists. Direct hire authority allows an agency to expedite the typical hiring process by eliminating certain steps traditionally required for competitive hiring, including competitive rating and ranking, and veterans' preference procedures. Direct hire authority can be either government-wide or agency specific.

However, OPM did not collect or report information from the Department of Defense as to the reasons for the decline.

The June 2023 report does not identify factors that directly impacted agencies' decreased use of Pathways. For example, OPM's June 2023 Pathways study reported that the use of DHAs increased during the same timeframe that Pathways hiring decreased. OPM officials stated that they did not know if these DHAs were used to hire for the same types of positions for which the Pathways hiring authority would be used, such as internships.¹⁷ OPM officials stated that they did not analyze the agencies' use of DHAs to determine why they were being used instead of Pathways to hire candidates.

In another example, OPM identified an agency that had stopped using Pathways hiring in fiscal year 2021, but OPM did not seek additional information to identify the reasons the agency no longer used Pathways. Instead, OPM eliminated the agency from its sample.¹⁸

We also found that OPM collects data on agencies' Pathways hiring plans, but it is missing opportunities to analyze these data to identify factors impacting the program. Specifically, in fiscal year 2014, OPM officials told us that they began requiring agencies to annually submit hiring projections for each of the Pathways Programs. Officials stated that the Pathways' Presidential Management Fellows (PMF) program used these data to understand recruitment activity and hiring demands for the following class year. For example, the program used these data to help inform outreach to academia in advance of the fall application and the expected size of the resulting Fellows' class. OPM did not use these data to inform the other two programs—the internship and the recent graduates programs. In addition, OPM did not compare the agencies' projected hiring goals with their actual hiring numbers for each fiscal year. OPM is missing an opportunity to better understand the hiring practices of the PMF program and analyze data that have already been collected to better inform all Pathways programs.

We have previously reported that federal-decision makers should use evidence about whether federal programs and activities are achieving intended results. We reported that agencies should build a portfolio of

¹⁷A hiring authority is the law, executive order, or regulation that allows an agency to hire a person into the federal civil service.

¹⁸OPM's first study in 2016 included 17 agencies. OPM included the same agencies in its 2023 study except for the eliminated agency.

high-quality, credible sources of evidence—rather than a single source—to support decision-making. Among the key practices that can help agencies develop and use the evidence they need to effectively assess the results of programs is developing an evidence-building implementation plan.¹⁹ An agency would need to:

- develop implementation steps to guide efforts to build new evidence to ensure it is useful to learning and decision-making;
- use the resulting evidence to assess if planned results were achieved, and why or why not; and
- leverage what is learned to inform decision-making, such as changing existing approaches to achieve better results.²⁰

This type of evidence-building implementation plan can help OPM assess, understand, and identify opportunities to improve the results of the Pathways programs.

OPM officials stated that in fiscal years 2025 and 2026, they plan to take various actions to assess Pathways. For example, they intend to:

- consult with agencies to identify factors impacting the number of Pathways hires, including reasons for the increased use of direct hiring authorities;
- hold quarterly meetings with agency officials responsible for Pathways program recruitment and hiring; and
- evaluate Pathways guidance changes approximately 1 year after the Pathways regulations were amended to identify challenges, gaps, and leading practices.

However, OPM officials told us that they have yet to develop a plan for building evidence that, for example, identifies the agencies they intend to reach out to, the information they will collect, or how they will collect it. They have also not determined how they can leverage the hiring

¹⁹GAO, *Evidence-Based Policymaking Practices to Help Manage and Assess the Results of Federal Effort*, [GAO-23-105460](#) (Washington, D.C.: July 2023). In that report, we identified developing an evidence-building implementation plan as a key action in the practice to generate new evidence. Such a plan helps ensure that the new evidence is useful and ultimately used to assess results and inform decision-making. This is important because building evidence can be time and resource intensive. An effective implementation plan can help ensure that the organization's evidence-building effort is completed within appropriate time frames and budget.

²⁰[GAO-23-105460](#).

projection data they already collect to understand upcoming hiring demands for the internship and the recent graduates programs—similar to what they did for the PMF program. By developing and implementing a plan for collecting and assessing the data it needs to identify factors that are influencing Pathways hiring, OPM would be better positioned to take corrective actions and achieve intended results.

OPM Collected Agency Feedback on Pathways Challenges but Did Not Seek Perspectives from the Majority of Applicants and Participants

OPM has taken steps to collect feedback from agencies on the challenges of the Pathways program, such as through the Chief Human Capital Officers (CHCO) Council and by soliciting agencies' input on the revisions of the Pathways regulations.²¹ However, OPM did not collect feedback from the majority of participants of the intern and recent graduate Pathways programs.

Feedback from Agencies. In fiscal year 2019, the CHCO Council convened a working group to discuss challenges, issues, and successes in using Pathways. The working group also provided OPM staff with several ideas and recommendations for improving Pathways, some of which were included in the most recent revisions to the Pathways regulations, such as expanding the timeframe for converting Pathways interns to positions in the competitive service from 120 to 180 days.

Additionally, OPM has sought agency feedback on Pathways at other points in time. For example:

- Between fiscal years 2012 and 2016, OPM hosted monthly office hours meetings where agencies' officials responsible for implementing Pathways with questions could meet with OPM officials to discuss solutions and recommendations to challenges agencies encountered when using Pathways. In addition, OPM held quarterly meetings with each of these officials to provide guidance and direction.
- According to OPM officials, agency Pathways officials and PMF Coordinators have contacted and continue to contact OPM directly for advice and guidance on using Pathways since its inception.

²¹The Chief Human Capital Officers Act of 2002 (CHCO) established the CHCO Council to advise and coordinate the activities of member agencies on such matters as the modernization of human resources systems, improved quality of human resources information, and legislation impacting human resources operations and organizations. The CHCO Council is chaired by the Director of OPM and serves to coordinate and collaborate on the development and implementation of federal human capital policies. Pub. L. No. 107-296, title XIII, § 1303, 116 Stat. 2135, 2288-89 (2002).

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- In fiscal years 2023 and 2024, OPM solicited and considered comments provided by agencies, as well as those from the public and professional organizations to inform its amendments to the Pathways regulations. According to OPM officials, these comments gave OPM additional insight into how agencies use the Pathways hiring authorities as well as agencies' experiences and challenges hiring and meeting early career talent pipeline needs.

Presidential Management Fellows Surveys.

Most of these surveys have been in place for at least 3 years and ask about the individuals' experiences at each milestone of the Presidential Management Fellows (PMF) process. For example, PMF applicants are asked about their overall experiences, how clear the Pathways application instructions were, and the usefulness of the information provided by the PMF Program Office. The Office of Personnel Management (OPM) also surveyed individuals who chose to withdraw from the application process at each of the milestones as well. These withdrawal surveys ask, among other things, the primary reason for withdrawal and any suggestions to improve the PMF program experience. OPM officials told us that they made changes to aspects of the PMF program based on feedback from participants. For example, PMF participants stated that they wanted more in-person networking opportunities to meet PMF's working across the government, which OPM subsequently organized and scheduled.

Source: GAO analysis. | GAO-25-106658.

Feedback from PMF Applicants and Participants. OPM also sought feedback in the form of surveys from PMF applicants and participants.²² Specifically, OPM officials told us that the PMF program uses information from 14 different surveys administered annually or more frequently (see sidebar). Five of the 14 surveys are targeted to agencies with PMF participants to identify their workforce planning needs. Agency surveys also ask about the agency's IT development needs, its experience with the most recent fellows to improve the next PMF cycle, and to understand its training needs. For example, the PMF program conducted virtual training sessions for the agencies and these surveys ask about the agencies' interests and needs for future training.

OPM officials told us that they survey individuals at different milestones in the PMF program, specifically when participants are:

- applicants to the PMF program,
- semi-finalists, and
- accepted PMF participants.

Because participants in the PMF program generally comprised 3 percent of Pathways hires, this feedback is limited and does not provide the views of participants in the internship and recent graduate programs—the overwhelming majority of Pathways participants.

According to OPM, it conducts post event surveys to capture feedback from participants using its Intern Experience Program, launched in 2023. This survey asks all federal interns to complete an end of program survey which opened on July 22, 2024, and closed approximately a month later on August 23, 2024. According to OPM, of the 204 survey respondents, 57 percent, or 116 respondents, stated they were a Pathways intern.

²²On February 19, 2025, President Trump signed EO 14217, which terminated the PMF program. See Exec. Order 14217, *Commencing the Reduction of the Federal Bureaucracy*, 90 Fed. Reg. 10577 (Feb. 25, 2025). The EO directed OPM initiate the process to withdraw the regulations implementing the PMF program and amended EO 13562 to remove references to PMF, upon the effective date of OPM's final rule.

OPM officials stated that they will continue to survey Intern Experience Program participants on annually.

While surveying all federal interns is an important first step, OPM has not surveyed Pathways interns and recent graduates on their experiences. EO 13562, which created Pathways, directed OPM to develop plans to evaluate agencies' effectiveness in recruiting and retaining talent using Pathways and the satisfaction of participants. OPM has collected feedback from PMF participants, and OPM has plans to contact agency Pathways Program Officers to find out if agencies conduct their own surveys for Pathways participants. However, OPM has not created a survey for interns and recent graduates, who represent approximately 97 percent of all Pathways participants.

Furthermore, in its 2023 memorandum accompanying its internship guidance, OPM recommended that agencies collect qualitative data (i.e., exit surveys) on the perceptions of interns, fellows, and apprentices.²³ According to OPM, federal agencies have been delegated authority to fully use the intern and recent graduate hiring authorities, which grants them the latitude to incorporate a feedback mechanism to survey Pathways participants. However, OPM does not have a process in place to collect or analyze any participant data that agencies may have collected through their own feedback mechanisms. OPM stated that it would need to consult with agencies on ways to gather information from agencies regarding the satisfaction of Pathways participants. Without developing and implementing a plan to collect and evaluate feedback data specific to the Pathways program, OPM does not know whether participants are satisfied with the program or faced challenges. Moreover, OPM is not well positioned to identify additional ways to improve Pathways from a user perspective.

²³Office of Personnel Management, *Guide to Internships, Fellowships, Apprenticeships, and Other Programs: Guidance on Promoting Internships and Other Student and Early Career Programs in the Federal Government* (Washington, D.C.: January 2023).

OPM Has Identified Agency Successes in Recruitment and Outreach, but Has Not Fully Established a Lessons-Learned Process

OPM Has Identified Agency Successes in Recruitment and Outreach that May be Used to Increase Student Interest in Pathways

According to OPM, successful recruitment is critical to the success of the federal government and as such, it is committed to providing federal agencies with the tools and support needed to attract well-qualified applicants. OPM has developed and issued guidance to agencies that includes examples of agencies' approaches on recruitment and outreach, which may also be applicable for use in Pathways. Recruitment examples include the following:

- The National Aeronautics and Space Administration developed a corporate LinkedIn page to target diverse candidate pools, such as engineers and scientists.
- Some agencies tag job opportunity announcements so they appear in curated branded search pages on USAJOBS such as, intern.usajobs.gov, stem.usajobs.gov and tech.usajobs.gov.
- The Department of Veterans Affairs and National Aeronautics and Space Administration use recruitment videos in announcements to introduce applicants to the agencies and their unique missions.

Examples of agencies' approaches on advancing Diversity, Equity, Inclusion, and Accessibility outreach include the following:²⁴

- The Department of Energy (DOE) established an annual Disability Mentoring Day which offers an opportunity for disabled college students to explore internships with DOE.
- The Department of Homeland Security (DHS) created a strategic marketing outreach plan to simplify and standardize data collection

²⁴These issues were addressed by EO 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*, 86 Fed. Reg. 34593 (June 30, 2021). However, EO 14035 was rescinded on by EO 14148 on January 20, 2025. See 90 Fed. Reg. 8237 (Jan. 28, 2025).

and validation of recruiting costs across DHS. The aggregated data allow DHS to track recruitment activity by metrics such as targeted audience or schools, including minority serving institutions such as Historically Black Colleges and Universities (HBCU), to enable DHS to better understand how resources are being allocated or need to be adjusted.

- The U.S. Institute of Peace expanded recruitment outreach to include HBCUs and Black professionals in international affairs. It has also posted positions on over 30 diversity job boards, such as Hire a Hero, African American Careers, and Asian Careers.

In addition to these guidance documents on recruitment and outreach, OPM has established relationships with minority-serving institutions for outreach and recruitment, such as Hispanic-Serving Institutions and HBCUs. For example, in fiscal years 2023 and 2024, OPM officials told us that they have conducted outreach events at two HBCUs to inform students about federal internship and career opportunities.

According to officials, OPM has several efforts underway to provide additional information and guidance to potential Pathways participants including updating its website to make information easier to find.

Although OPM Meets with Agency Officials About Using Pathways, Agencies Continue to Request Additional Information on Making Pathways More Effective

OPM has taken steps to provide Pathways agencies with opportunities to ask for additional guidance on implementation of the programs. For example, OPM officials stated that it has scheduled monthly meetings and office hours with Pathways Program Officers (PPOs) and will continue to do so on a quarterly basis beginning in the second quarter of fiscal year 2025. Additionally, as stated in the recently revised Pathways regulations, PPOs are responsible for serving as liaisons to OPM by providing updates on the agency's implementation of its Pathways Programs, clarifying technical or programmatic issues, sharing agency best practices, and other similar duties.²⁵ However, OPM has not explored using these updates as part of a process to collect and disseminate, among other things, lessons learned among the Pathways agencies. We have previously reported that informal information sharing, such as office hours with OPM, does not ensure everyone is benefiting from the lessons that are gleaned. In particular, we found that collecting and sharing lessons learned from an interagency effort is valuable since

²⁵ 5 C.F.R. § 362.104(a)(7)(iii).

one agency can share lessons it has learned with other agencies that may benefit from the information.²⁶

Additionally, agencies continue to have questions on making Pathways more effective. For example, as part of the recent issuance of Pathways regulations, OPM received comments from agencies on the proposed regulatory revisions. OPM acknowledged in the public comments that federal agencies had “asked for more options in sharing information about Pathways opportunities.”²⁷ However, OPM did not state how it will accomplish this information sharing—such as using a lessons learned process. Therefore, it is unclear whether OPM has plans to do so. According to OPM officials, OPM plans to evaluate the new Pathways guidance changes after a full year of implementation to identify challenges, gaps, and leading practices. However, OPM has not shared details of that plan nor how it plans to share lessons learned on successful hiring despite eligibility expansion to include individuals who have completed certain career or technical education programs.

²⁶According to key practices that we and others have identified for both program and project management, it is important to identify and apply lessons learned from programs, projects, and missions to limit the chance of recurrence of previous failures or difficulties. Lessons learned serve to communicate knowledge more effectively and to ensure that beneficial information is factored into planning, work processes, and activities. They also provide a powerful method of sharing ideas for improving work processes, facility or equipment design and operation, quality, and cost-effectiveness. Moreover, as we and others have previously found, agencies can learn lessons from an event and make decisions about when and how to use that knowledge to change behavior. Key practices of a lessons-learned process include collecting, analyzing, saving or archiving, and sharing and disseminating information and knowledge gained on positive and negative experiences. See GAO, *Project Management: DOE and NNSA Should Improve Their Lessons-Learned Process for Capital Asset Projects*, [GAO-19-25](#) (Washington, D.C.: Dec. 21, 2018); and *Federal Real Property Security: Interagency Security Committee Should Implement a Lessons-Learned Process*, [GAO-12-901](#) (Washington, D.C.: Sept. 10, 2012).

²⁷89 Fed. Reg. 25751, 25752 (Apr. 12, 2024).

Office of Personnel Management's COVID-19 Lessons-Learned Process

The Office of Personnel Management (OPM) has demonstrated the willingness and the ability to develop a lessons-learned process for other purposes. In 2021, we recommended that OPM develop and implement a process for collecting and sharing comprehensive government-wide information on the lessons learned associated with agencies' use of different hiring authorities in response to the COVID-19 pandemic. In response, OPM issued a report in February 2024, *Human Capital Management Evaluation of Agencies' Use of Hiring Flexibilities* for the COVID-19 Crisis, which evaluated the effectiveness of special hiring flexibilities authorized in response to the COVID-19 pandemic. By analyzing the data they had collected, OPM identified additional actions that could potentially support agency hiring needs during national emergencies. OPM also used information from surveying federal hiring managers and human resource staff involved in the hiring process, specific to the COVID-19 response initiative.

Source: GAO analysis. | GAO-25-106658.

As the chief human resources agency and personnel policy manager for the federal government, OPM plays an important role in helping agencies understand how to implement specific hiring authorities, including the Pathways Program hiring authorities.²⁸ Although OPM has issued guidance and documents that include agencies' lessons learned related to improving student hiring, it does not have a documented process to collect, share, and apply lessons learned on an ongoing basis for Pathways programs. We have previously reported that the use of lessons learned is a principal component of an organizational culture committed to continuous improvement.²⁹ We reported that lessons learned could be used to help agencies successfully recruit and hire more interns and recent graduates. Additionally, as shown in the sidebar, OPM has recognized the merits of implementing a lessons-learned process and has had experience developing and implementing such a process.

Without a process to collect and share lessons learned, OPM is missing an opportunity to leverage stakeholders' knowledge. Furthermore, such a process would better position stakeholders to hire newly eligible Pathways applicants and to avoid previously encountered setbacks at agencies. If OPM is not able to identify successful recruitment and outreach efforts for Pathways, it could potentially hinder the government's ability to recruit, hire, retain, and manage its early career talent pipeline.

Conclusions

OPM has undertaken several important efforts to improve the federal early career talent pipeline government-wide through Pathways, such as launching an internship portal on USAJOBS and intern-specific training. While these actions may have assisted in increasing the number of hires in recent years, the overall Pathways hires have decreased since its implementation in fiscal year 2013. Furthermore, although OPM officials stated that they plan to consult with agencies regarding the overall decrease in Pathways hires, they have not developed a plan to collect and analyze evidence from agencies that could address the overall decrease in Pathways hires. Similarly, until OPM collects and evaluates

²⁸Congress provided the President with the authority to except positions from the competitive service, which the President has delegated to OPM. 5 U.S.C. §§ 1104, 3302 and 5 C.F.R. §§ 6.1, 213.102. The President, through EO 13562, established Schedule D, an excepted service hiring authority, to cover Pathways appointments. In 2012, OPM issued regulations on the Pathways Programs.

²⁹According to our prior work and the work of the U.S. Army's Center for Army Lessons Learned, a lesson is knowledge or understanding gained by experience. The experience may be positive, such as a successful test or exercise, or negative, such as a mishap or failure. A lesson is learned when an organization can measure a change in behavior. See [GAO-19-25](#) and [GAO-12-901](#).

feedback for all Pathways participants, it misses opportunities to mitigate any challenges faced by participants. Moreover, collecting and sharing lessons learned on the implementation of Pathways would better position OPM to strengthen agencies' early talent pipeline.

Recommendations for Executive Action

We are making the following three recommendations to OPM.

The Director of OPM should develop and implement a plan to collect and assess the evidence OPM needs to identify factors impacting hiring trends of existing Pathways Programs. (Recommendation 1)

The Director of OPM should develop and implement a plan to collect and evaluate feedback data from Pathways participants on their satisfaction with existing Pathways Programs. (Recommendation 2)

The Director of OPM should develop and implement a process for collecting and sharing lessons-learned associated with recruitment and outreach for existing Pathways Programs. (Recommendation 3)

Agency Comments

We provided a draft of this report to OPM for review. OPM provided comments, which are reproduced in appendix III. In its written comments, OPM concurred with all three of our recommendations and stated actions it plans to take to address them.

We are sending copies to the appropriate congressional committees and the Acting Director of OPM. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-6806 or locked@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff members who made key contributions to this report are listed in appendix IV.



Dawn G. Locke
Director, Strategic Issues

Appendix I: Objectives, Scope, and Methodology

This report examines the extent to which the Office of Personnel Management (OPM) (1) increased internship and fellowship opportunities through Pathways Programs (Pathways), (2) collected information on any challenges from agencies and participants that could be used to improve Pathways, and (3) established a lessons-learned process for recruitment and outreach.

At the time we did our work, Pathways consisted of three programs—(1) the internship program for current students, (2) the recent graduates program for individuals who received a degree or certificate from a qualifying institution or completed a qualifying career or education program within the last 2 years, and (3) the Presidential Management Fellows (PMF) program for individuals who obtained advanced degrees within the preceding 2 years. On February 19, 2025, President Trump signed EO 14217, which commenced the process of terminating the PMF program.¹

To address the first objective, we examined federal laws, regulations, and the executive order related to Pathways hiring. We also reviewed OPM guidance and our related past reports on the federal workforce. We compared OPM's efforts to increase Pathways opportunities to criteria we identified in prior work on effectively implementing federal evidence-building and performance-management activities. We also interviewed officials from OPM and the Chief Human Capital Officers (CHCO) Council, and organizations knowledgeable about college and university students' advancement—the Hispanic Association of Colleges and Universities and the White House initiative for Historically Black Colleges and Universities—to obtain their views on the status of OPM's activities to increase internships and fellowships through Pathways.

To identify demographic and other information on Pathways interns, recent graduates, and fellows, we analyzed data from OPM's Enterprise Human Resources Integration (EHRI) database for fiscal years 2013 through 2023. We used EHRI's "legal authority" and "nature of action" codes to identify the hiring authorities that agencies used for Pathways hires. We analyzed information on the hires' demographic characteristics—race and ethnicity, gender, generation, and disability status—and other characteristics—program, agency, location, and

¹Exec. Order 14217, *Commencing the Reduction of the Federal Bureaucracy*, 90 Fed. Reg. 10577 (Feb. 25, 2025). The EO directed OPM initiate the process to withdraw the regulations implementing the PMF program and amended EO 13562 to remove references to PMF, upon the effective date of OPM's final rule.

veteran status. Fiscal year 2013 was the first full fiscal year after the programs were implemented and fiscal year 2023 was the most recent fiscal year of available data. EHRI is the primary government-wide source for information on federal employees. The EHRI data we analyzed cover most executive branch civilian employees and some legislative and judicial branch employees but does not cover the U.S. Postal Service or intelligence agencies.

We conducted descriptive analyses of the data, calculating changes over time for the hires' races and ethnicities, gender, estimated generation, disability statuses, programs, agencies, and veteran status. We calculated averages for the hires' locations. We used OPM's general schedule locality pay areas as a proxy for the hire's location.² Approximately 60 agencies that signed a memorandum of understanding with OPM to use the Pathways hiring authorities were included in our analysis. Our descriptive analyses provide helpful information on the demographic characteristics and other characteristics of the hires, but they do not account for other factors that may have impacted these outcomes.

We assessed the reliability of OPM's EHRI data sets and data elements by performing electronic testing, reviewing existing information about the data and the system that produced them, and verifying information with agency officials knowledgeable about the data. We determined these data to be sufficiently reliable for our purposes.

To address the second objective, we identified relevant federal laws and policies that outline OPM's oversight responsibilities for hiring authorities and interviewed OPM on the implementation, results, and analysis of these oversight efforts. We reviewed OPM agency guidance and other documents, OPM's prior study on Pathways, and Pathways Programs' handbook and regulations. We interviewed OPM officials responsible for Pathways planning, implementation, and oversight, as well as those individuals responsible for individual programs within Pathways. We collected and reviewed surveys distributed by the PMF program to PMF participants. We reviewed applicable statutes, regulations, and other requirements that outline OPM's oversight responsibilities for the use of federal hiring authorities including those related to Pathways Programs.

²There are 58 separate locality pay areas across the country as of January 1, 2025. The locality pay areas consist of a main metropolitan area defined by the Office of Management and Budget that forms the basic locality pay area and areas of application adjacent to the basic locality pay area.

Finally, we interviewed CHCO Council members to identify their efforts to collect information from agencies on any challenges associated with using Pathways. We reviewed our prior reports concerning hiring authority use and OPM oversight.

To address the third objective, we reviewed agency reports, slide presentations, and other documentation of OPM's efforts to provide agencies government-wide guidance on recruitment and outreach efforts for hiring all positions. We requested and reviewed OPM's guidance to agencies that includes examples of recruitment and/or outreach.

We conducted this performance audit from February 2023 to March 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Composition of Pathways Programs Hires by Demographic and Other Characteristics

Demographic Characteristics

We found that the demographic characteristics of Pathways Programs (Pathways) hires changed over the time frame of fiscal years 2013 through 2023. We also compared these trends with demographic trends in the federal workforce identified in a prior report of ours to determine if demographic changes in Pathways hires followed those in the federal workforce for fiscal years 2011 through 2021.¹ We summarized the comparisons to demographic changes in the text and not in the figures. We made these comparisons to provide additional information on the demographic characteristics of Pathways hires using Enterprise Human Resources Integration (EHRI) data to analyze Pathways hiring trends. We found that some demographic characteristics, such as race and ethnicity and gender, in Pathways hires followed trends found in the federal workforce during a similar timeframe, while other characteristics, such as estimated generation and disability status, differed.

Race and Ethnicity. For fiscal years 2013 through 2023, the representation of some historically disadvantaged racial and ethnic groups in Pathways increased slightly (see fig.4), similar to trends in the federal workforce for fiscal years 2011 through 2021. For example, Pathways hires who identified as (1) Asian (non-Hispanic) and (2) Hispanic (any race) increased by around 4 percentage points and 4 percentage points, respectively.² Other historically disadvantaged racial and ethnic groups decreased. For example, hires who identified as Black or African American (non-Hispanic) decreased by around 4 percentage points.³

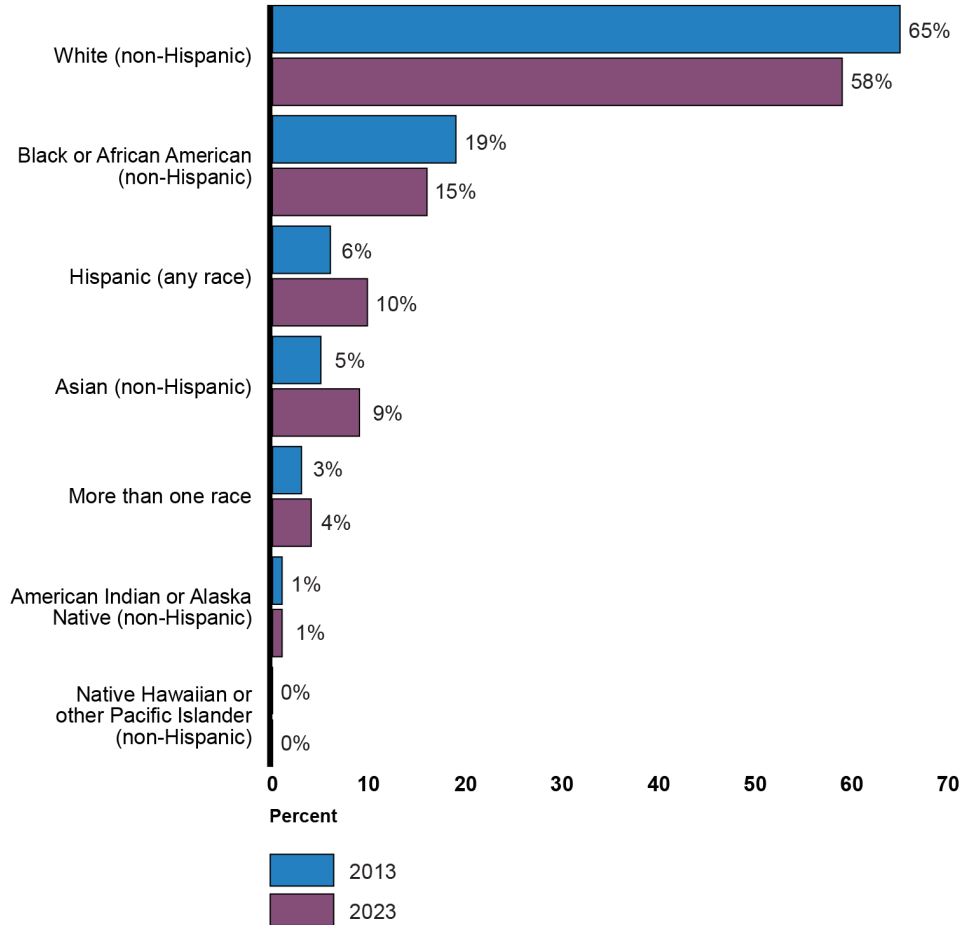
¹GAO, *Federal Workforce: Data Reveal Minor Demographic Changes 2011-2021*, [GAO-24-105924](#) (Washington, D.C.: Nov. 17, 2023).

²For fiscal years 2011 through 2021, the representation of federal employees who identify as Asian increased by 1.2 percent and those who identify as Hispanic increased by 1.4 percent.

³For fiscal years 2011 through 2021, the representation of federal employees who identify as Black or African American increased by 0.6 percent.

Appendix II: Composition of Pathways Programs Hires by Demographic and Other Characteristics

Figure 4: Percentage of Pathways Programs Hires by Race and Ethnicity for Fiscal Years 2013 and 2023



Source: GAO analysis of Enterprise Human Resources Integration data. | GAO-25-106658

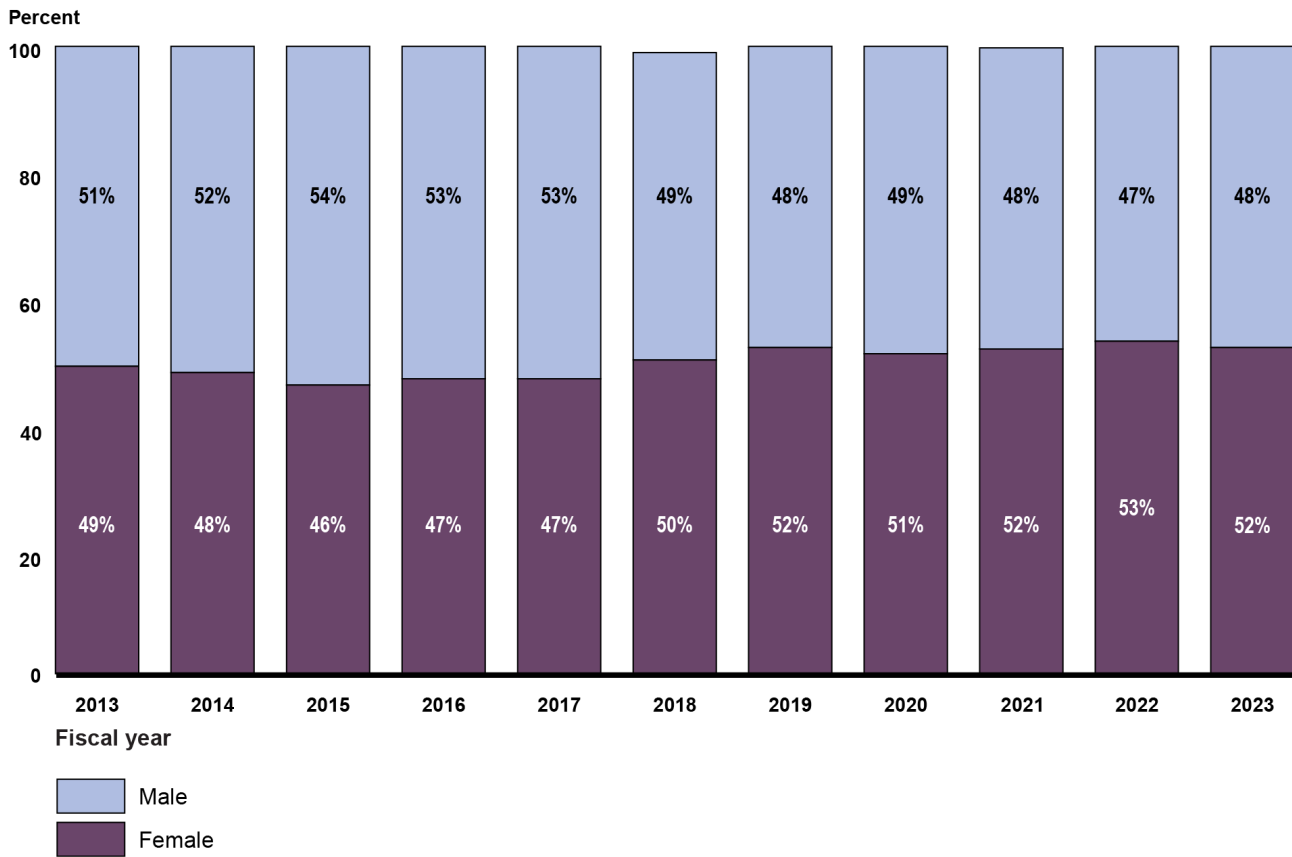
Note: Data shown reflect percentages of all Pathways Programs hires for fiscal years 2013 and 2023 excluding instances for which race and ethnicity status is unknown.

As of March 29, 2024, the Office of Management and Budget revised the standards for the classification of federal data on race and ethnicity to create a new "Middle Eastern or North African" category for persons having origins in any of the original peoples of North Africa or the Middle East, and separate and distinguish that category from the "White" category. See 89 Fed. Reg. 22182 (March 29, 2024).

Gender. The proportion of males and females Pathways hires remained relatively stable for fiscal years 2013 through 2023, similar to trends in the federal workforce for fiscal years 2011 through 2021 (see fig.5).

Appendix II: Composition of Pathways Programs Hires by Demographic and Other Characteristics

Figure 5: Percentage of Pathways Programs Hires by Gender for Fiscal Years 2013 Through 2023

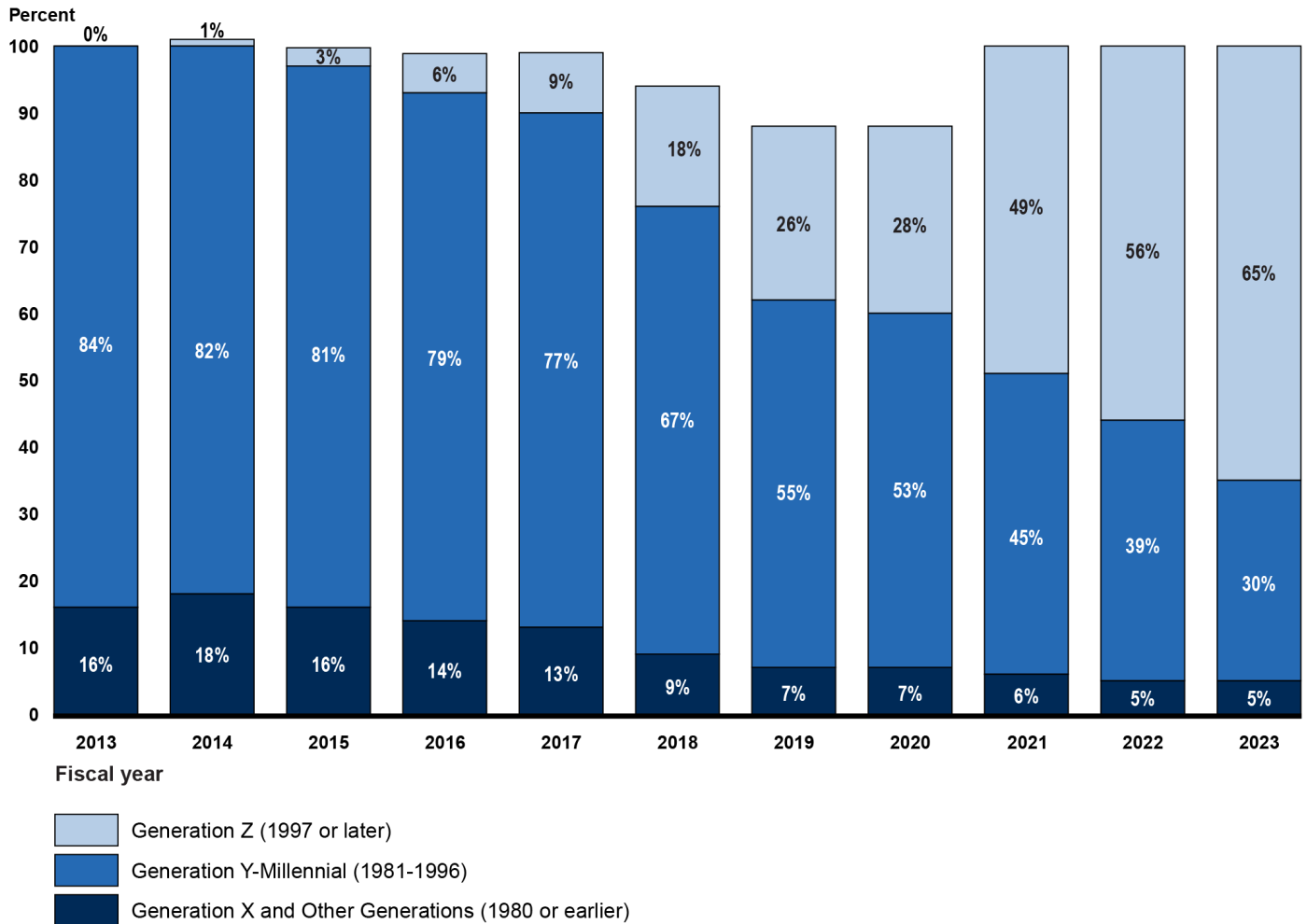


Source: GAO analysis of Enterprise Human Resources Integration data. | GAO-25-106658

Estimated Generation. Generation Y-Millennial hires (born between 1981 and 1996) were the largest represented generation among Pathways hires averaging 63 percent for fiscal years 2013 through 2023 (see fig.6). In fiscal year 2021, Generation Z hires (born in 1997 or later) were the largest represented generation among Pathways hires while Generation X hires (born between 1965 and 1980) were the largest represented generation in the federal workforce.

Appendix II: Composition of Pathways Programs Hires by Demographic and Other Characteristics

Figure 6: Percentage of Pathways Programs Hires by Estimated Generation for Fiscal Years 2013 Through 2023



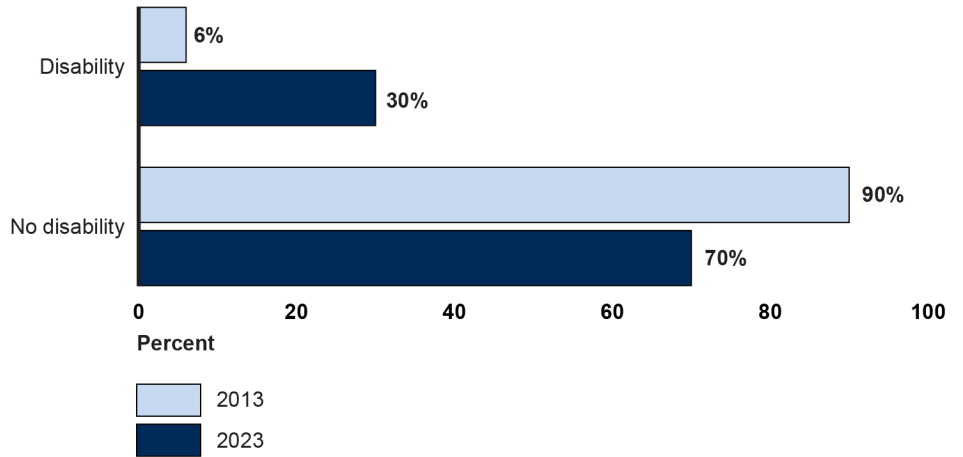
Source: GAO analysis of Enterprise Human Resources Integration data. | GAO-25-106658

Note: Data shown reflect percentages of all Pathways Programs hires for fiscal years 2013 through 2023 excluding instances for which estimated generation status, which was calculated by the age of hire, is suppressed or missing.

Disability Status. The representation of Pathways hires with disabilities increased by around 24 percent for fiscal years 2013 through 2023 (see fig. 7). This percentage is lower than the trend observed in the federal

workforce where the representation of persons with disabilities doubled for fiscal years 2011 through 2021.⁴

Figure 7: Percentage of Pathways Programs Hires by Disability Status for Fiscal Years 2013 and 2023



Source: GAO analysis of Enterprise Human Resources Integration data. | GAO-25-106658

Note: Data shown reflect percentages of all Pathways Programs (Pathways) hires for fiscal years 2013 and 2023 excluding instances for which disability status is unknown. Pathways hires with a disability status include individuals who disclosed a disability during the hiring process, individuals with disabled veteran status, and individuals hired with Schedule A authority.

Other Characteristics

We analyzed EHRI data by program (internship, recent graduates, and Presidential Management Fellows (PMF)), agency, location, and veteran status for fiscal years 2013 through 2023 to illustrate how OPM can use these data to analyze Pathways hiring trends.

Program. Our analysis shows the following:

- Despite being the largest program, internship hires decreased from 93 percent of total hires in fiscal year 2013 to 63 percent of total Pathways hires in fiscal year 2023 (see fig. 8).

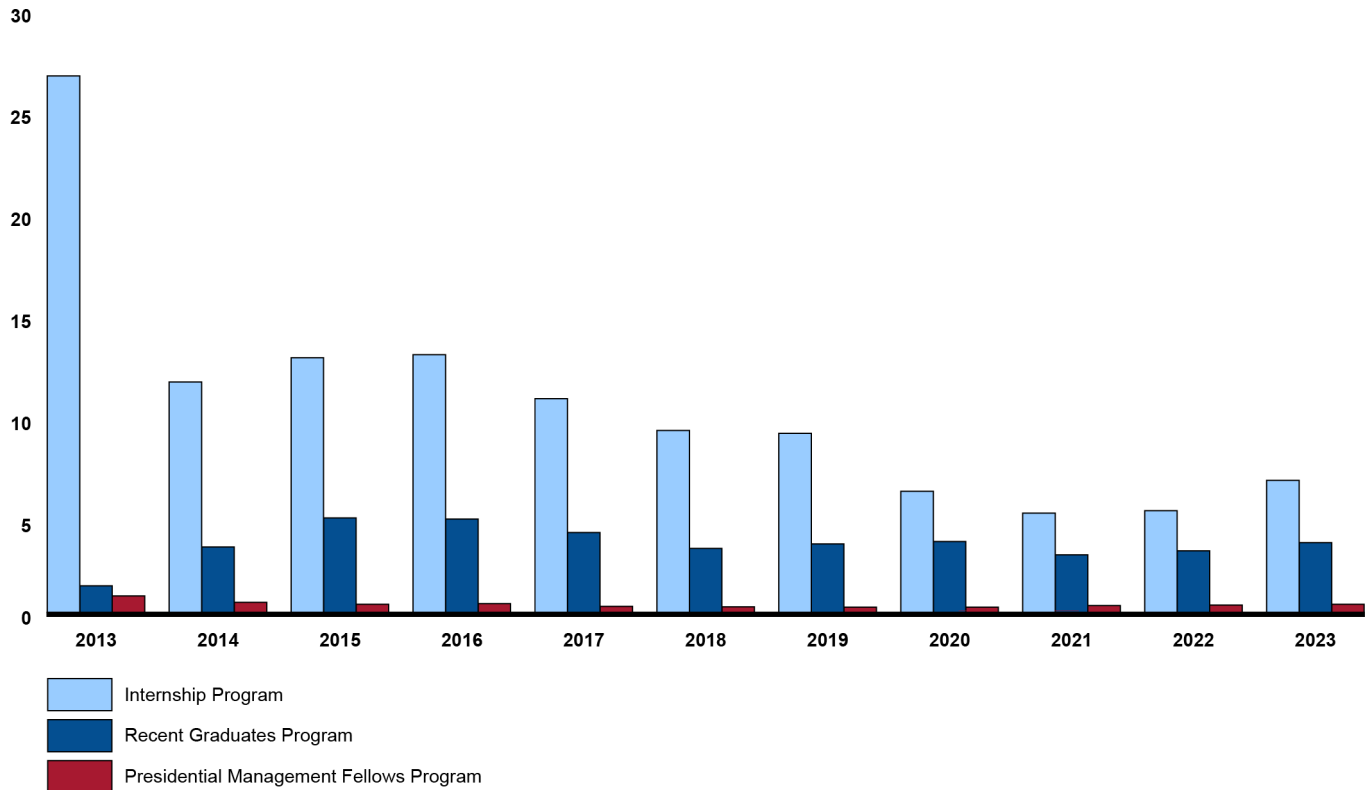
⁴Other federal internship programs are available for students and recent graduates with disabilities. For example, the Departments of Labor and Defense administer programs to connect federal and select private-sector employers with students and recent graduates with disabilities through internships or permanent jobs.

Appendix II: Composition of Pathways Programs Hires by Demographic and Other Characteristics

- The second largest program, recent graduates, increased from 5 percent of total Pathways hires in fiscal year 2013 to 33 percent of total hires in fiscal year 2023.
- The PMF program increased slightly from 3 percent of total hires in fiscal year 2013 to 4 percent of total Pathways hires in fiscal year 2023.

Figure 8: Pathways Programs Hires Have Decreased Since Programs' Implementation

Pathways Programs Hires by Fiscal Year (in thousands)



Source: GAO analysis of Enterprise Human Resources Integration data. | GAO-25-106658






Note: Exec. Order 14217, Commencing the Reduction of the Federal Bureaucracy, 90 Fed. Reg. 10577 (Feb. 25, 2025). The EO directed OPM initiate the process to withdraw the regulations implementing the PMF program and amended EO 13562 to remove references to PMF, upon the effective date of OPM's final rule.

Agency. Our analysis found that the Departments of Defense and the Interior were the largest employers of Pathways hires for fiscal year

Appendix II: Composition of Pathways Programs Hires by Demographic and Other Characteristics

2013.⁵ Figure 9 shows these two agencies, in addition to the Departments of Veterans Affairs and Education, and the National Science Foundation, as the five agencies that experienced the largest percentage decreases in the number of Pathways hires from fiscal year 2013 to fiscal year 2023.

Figure 9: Agencies with the Largest Percentage Decreases in the Number of Pathways Programs Hires from Fiscal Years (FY) 2013 to 2023

| Agency | FY 2013 | FY 2023 | Percentage Change From FY 2013 to FY 2023 |
|--|---------|---------|---|
|  Department of Veterans Affairs | 2,033 | 310 | -85% |
|  Department of the Interior | 5,037 | 824 | -84% |
|  Department of Defense | 8,545 | 1,462 | -83% |
|  Department of Education | 65 | 14 | -78% |
|  National Science Foundation | 150 | 42 | -72% |

Source: GAO analysis of Enterprise Human Resources Integration data, Department of Veterans Affairs; (Seal), Department of the Interior; (Seal), Department of Defense; (Seal), Department of Education; (Seal), National Science Foundation; (Seal). | GAO-25-106658






Note: Data shown reflect numbers of all Pathways Programs hires for fiscal years 2013 and 2023 excluding instances for which agency status is suppressed or unknown.

While the overall hiring trend has been a decrease in the number of Pathways hires, nine agencies experienced increases in the number of hires. In particular, the Social Security Administration experienced the largest increase in the number of hires—a 1,110 percent increase, from 20 hires in fiscal year 2013 to 242 hires in fiscal year 2023. Figure 10 shows the Social Security Administration as one of five agencies that experienced the largest percentage increases in the number of Pathways hires from fiscal year 2013 to fiscal year 2023.

⁵Agencies included in our analysis are those that signed a memorandum of understanding with OPM to use the Pathways hiring authorities. The final rule removed this requirement and replaced it with the requirement for agencies to establish a Pathways policy before using the Pathways hiring authorities. See 5 C.F.R. § 362.104.

Appendix II: Composition of Pathways Programs Hires by Demographic and Other Characteristics

Figure 10: Agencies with the Largest Percentage Increases in the Number of Pathways Programs Hires from Fiscal Years (FY) 2013 to 2023

| Agency | FY 2013 | FY 2023 | Percentage Change From FY 2013 to FY 2023 |
|---|---------|---------|---|
|  Social Security Administration | 20 | 242 | 1,110% |
|  Securities and Exchange Commission | 77 | 385 | 400% |
|  Equal Employment Opportunity Commission | 18 | 52 | 189% |
|  Environmental Protection Agency | 196 | 466 | 138% |
|  Export-Import Bank of the United States | 15 | 24 | 60% |

Source: GAO analysis of Enterprise Human Resources Integration data, Social Security Administration; (Seal), Securities and Exchange Commission; (Seal), Equal Employment Opportunity Commission; (Seal), Environmental Protection Agency; (Seal), Export-Import Bank of the United States; (Seal). | GAO-25-106658

Note: Data shown reflect numbers of all Pathways Programs hires for fiscal years 2013 and 2023 excluding instances for which agency status is suppressed or unknown.

Figure 11 below shows the number of Pathways hires by agency for fiscal years 2013 and 2023.

Appendix II: Composition of Pathways Programs Hires by Demographic and Other Characteristics

Figure 11: Number of Pathways Programs Hires by Agency for Fiscal Years (FYs) 2013 and 2023

| Agency | FY 2013 | FY 2023 | Agency | FY 2013 | FY 2023 |
|---|---------|---------|---|---------|---------|
| Department of Defense | 8,545 | 1,462 | Department of Housing and Urban Development | 166 | 70 |
| Department of the Interior | 5,037 | 824 | National Science Foundation | 150 | 42 |
| Department of Agriculture | 3,297 | 1,570 | Office of Personnel Management | 120 | 70 |
| Department of Veterans Affairs | 2,033 | 310 | Pension Benefit Guaranty Corporation | 96 | 32 |
| Department of Health and Human Services | 1,498 | 846 | Securities and Exchange Commission | 77 | 385 |
| Department of Justice | 1,211 | 573 | U.S. Agency for International Development | 67 | 92 |
| Department of Homeland Security | 866 | 490 | Department of Education | 65 | 14 |
| Department of the Treasury | 625 | 192 | Consumer Product Safety Commission | 58 | 34 |
| Department of Commerce | 522 | 279 | Federal Trade Commission | 45 | 62 |
| Federal Deposit Insurance Corporation | 479 | 439 | Federal Housing Finance Agency | 43 | 48 |
| Department of State | 468 | 192 | Farm Credit Administration | 33 | 19 |
| Department of Transportation | 347 | 184 | Executive Office of the President | 25 | 30 |
| National Aeronautics and Space Administration | 327 | 268 | Federal Communications Commission | 21 | 19 |
| Department of Energy | 318 | 195 | Social Security Administration | 20 | 242 |
| General Services Administration | 296 | 290 | Equal Employment Opportunity Commission | 18 | 52 |
| Department of Labor | 288 | 259 | Export-Import Bank of the United States | 15 | 24 |
| Environmental Protection Agency | 196 | 466 | | | |

Source: GAO analysis of Enterprise Human Resources Integration data. | GAO-25-106658

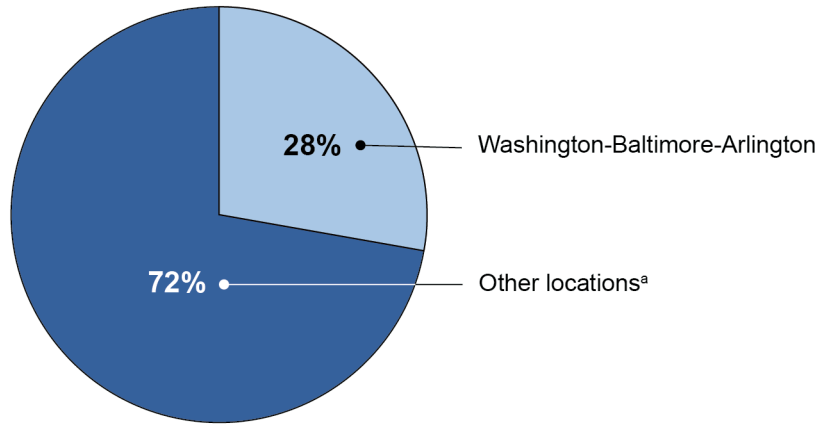
Note: Data shown reflect the numbers of Pathways Programs (Pathways) hires for fiscal years 2013 and 2023 excluding instances for which agency status is suppressed or unknown. The listed agencies are the ones that signed a memorandum of agreement to use the Pathways hiring authorities in fiscal years 2013 and 2023. The list does not account for agencies that did not sign an agreement as of fiscal year 2013 or did not renew their agreement as of fiscal year 2023.

Location. For fiscal years 2013 through 2023, an average of 28 percent of Pathways hires lived in the Washington-Baltimore-Arlington area,

Appendix II: Composition of Pathways Programs Hires by Demographic and Other Characteristics

making it the area with the largest number of Pathways hires in the last decade (see fig. 12).⁶

Figure 12: Average Percentage of Pathways Programs Hires by Location for Fiscal Years 2013 Through 2023



Source: GAO analysis of Enterprise Human Resources Integration data. | GAO-25-106658

Note: Data shown reflect the percentages of Pathways Programs hires for fiscal years 2013 through 2023 excluding instances for which location status is suppressed.

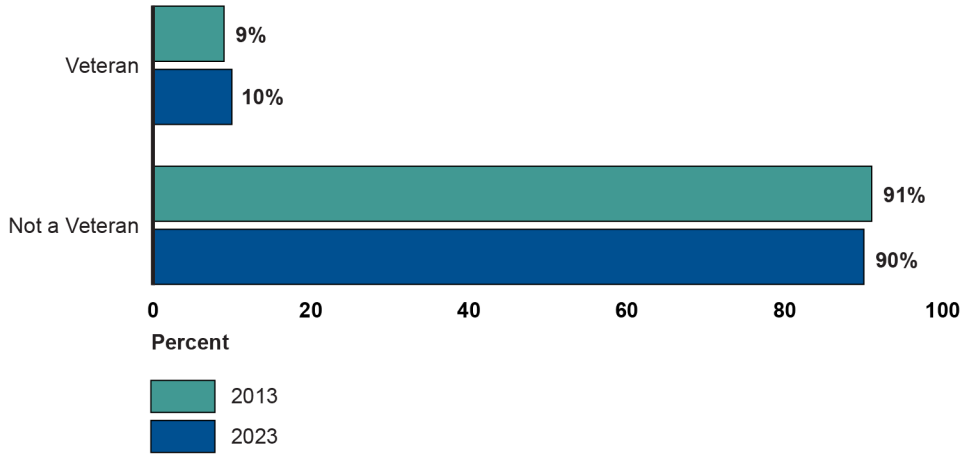
^aOther locations include (a) other counties in the contiguous United States, (b) the states of Alaska and Hawaii, and (c) portions of the United States and its territories and possessions (nonforeign areas) that are not located within another locality pay area.

Veteran Status. The percentage of veteran Pathways hires remained stable for fiscal years 2013 through 2023 (see fig. 13). On average, 13 percent of Pathways hires were veterans over this time frame.

⁶We used OPM's locality pay areas as a proxy for location. There are 58 separate locality pay areas across the country as of January 1, 2025. The locality pay areas consist of a main metropolitan area defined by the Office of Management and Budget which forms the basic locality pay area and areas of application adjacent to the basic locality pay area.

Appendix II: Composition of Pathways Programs Hires by Demographic and Other Characteristics

Figure 13: Percentage of Pathways Programs Hires by Veteran Status for Fiscal Years 2013 and 2023



Source: GAO analysis of Enterprise Human Resources Integration data. | GAO-25-106658

Note: Data shown reflect percentages of all Pathways Programs hires for fiscal years 2013 and 2023 excluding instances for which veteran status is unknown.

Appendix III: Comments from the Office of Personnel Management.



UNITED STATES OFFICE OF PERSONNEL MANAGEMENT

Washington, DC 20415

Ms. Dawn Locke
Director, Federal Workforce and Government Performance
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Locke:

Thank you for providing us the opportunity to respond to the Government Accountability Office (GAO) draft report, *Federal Workforce: OPM Needs to Take Additional Actions to Improve the Federal Early Career Talent Pipeline*, GAO-25-106658.

Responses to your recommendations are provided below.

Recommendation # 1: *The Director of OPM should develop and implement a plan to collect and assess the evidence OPM needs to identify factors impacting Pathways hiring trends.*

Management Response: We concur. Sec. 1107, Pub. L. 115-232. 132 Stat 2002. We plan to develop an efficient process to collect and assess the evidence OPM needs to identify factors related to the hiring trends, focusing on the two remaining components of the program, Internship and Recent Graduates.

Recommendation # 2: *The Director of OPM should develop and implement a plan to collect and evaluate feedback data from Pathways participants on their satisfaction with the Pathways Programs.*

Management Response: We concur. OPM is currently working to develop a brief survey tool to collect feedback from the program participants that will provide OPM and agencies insights into their overall experiences while in the program, level of satisfaction, and areas for review or improvement.

Recommendation # 3: *The Director of OPM should develop and implement a process for collecting and sharing lessons-learned associated with recruitment and outreach for the Pathways Programs.*

Management Response: We concur. OPM has already developed a system for cataloging Agency Leading Practices in many areas of human capital to include Pathways, but we will continue to home in on those leading practices that are specific to Pathways by using our current mechanisms of collecting more targeted feedback from


**Appendix III: Comments from the Office of
Personnel Management.**

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agencies on a regular and recurring basis to include the Pathways Programs Officers and CHCO Surveys.

I appreciate the opportunity to respond to this draft report. If you have any questions regarding our response, please contact Ana Mazzi, Associate Director, Ana.Mazzi@opm.gov.

Sincerely,

 Digitally signed by
VERONICA HINTON
Date: 2025.03.10
15:58:13 -04'00'

Veronica E. Hinton
Associate Director
Workforce Policy and Innovation

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

Dawn G. Locke, (202) 512-6806 or locked@gao.gov

Staff Acknowledgments

In addition to the individual named above, the following staff made key contributions to this report: Steven Lozano (Assistant Director), Dewi Djunaidy (Analyst-in-Charge), Monique Nasrallah, Michael Bechetti, Joseph Fread, Robert Gebhart, Jackson Gode, Jean McSween, Mark Tucker, and Clarette Yen.

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