

INTRODUCTION

This guide is designed to aid Human Resources (HR) professionals in the analysis and determination of whether applicants meet the minimum qualification requirements for position(s). This resource provides information and clarification on occupational qualification standards in the federal competitive service, particularly when there is a change or modification to the standard's minimum educational and other requirements in accordance with the Office of Personnel Management (OPM) General Schedule (or equivalent) white-collar occupation Qualification Policies and Standards. This guidance further introduces and describes assessment tools that can be used in conjunction with qualification standards to rate and rank well-qualified candidates who may be referred for selection.

FREQUENTLY ASKED QUESTIONS

Q1. What is the significance of qualification standards?

A1. Qualification standards describe the minimum requirements necessary to perform the work of a particular occupation successfully and safely. The minimum requirements outlined in the standard may include specific job-related work experience, education, medical or physical standards, training, security, and/or licensure.

NOTE: The qualification standards for white-collar occupations in the competitive service are in the Operating Manual: Qualification Standards for General Schedule Positions. To review the Operating Manual, please visit: <https://www.opm.gov/policy-data-oversight/classification-qualifications/general-schedule-qualification-standards/>. For information about the Job Qualification System for Trades and Labor Occupations, please visit: <https://www.opm.gov/policy-data-oversight/classification-qualifications/federal-wage-system-qualifications/#url=Overview>.

Q2. Why does OPM update or modify qualification standards?

A2. OPM updates or modifies standards due to substantive changes to occupational or agency requirements so that the appropriate qualification standard(s) are applied. OPM's goal is to keep the requirements in the qualification standards as current as possible.

NOTE: If agencies are experiencing difficulty in obtaining well-qualified applicants based on current qualification requirements, they may contact DCPAS Employment and Compensation, Field Advisory & Support, Dodhra.mc-alex.dcpas.list.ec-field-advisory--support@mail.mil who will coordinate and submit your request to revise or establish a new standard via DoD's Chief Human Capital Officer (CHCO) approval.

Q3. Are current federal employees required to meet the new/modified criteria (i.e., minimum education/experience) when OPM makes a change to a qualification standard?

A3. No. Employees currently assigned to positions in the occupational series as of the effective date the standard changed are considered to have met the basic requirements for the position occupied.

NOTE: Generally, OPM may post an implementation date in the issuance memo. All appointments effective after the implementation date must meet the new/revised qualifications in order to be eligible

for placement in the position. The “grandfathering clause” would only apply to current employees officially assigned to the occupation at the time of implementation.

Q4. Does DoD have the authority to apply an additional “grandfathering clause” or feature for current employees?

A4. No. DoD does not have authority to apply more or different grandfathering provisions than what is authorized by OPM’s qualification standards. OPM’s website has documented the grandfathering clause on the current qualification standards for medical occupations within the 0600 series, except for the GS-0645 Medical Technician, which already contains grandfathering provisions.

Q5. Are qualification standards used to rate and rank candidates?

A5. No. Qualification standards are not designed to rank candidates, identify the best qualified for a particular position, or substitute for an analysis of an applicant’s knowledge, skills, and abilities/competencies. President Obama’s memorandum dated May 11, 2010, “Improving the Federal Recruitment and Hiring Process,” required agencies to use the category rating approach to assess and select job applicants for positions filled through competitive examining. Within the DoD enterprise, applicants who meet the basic qualification requirements established for the position are placed into one of three quality categories: Best-Qualified, Highly-Qualified or Qualified.

NOTE: For additional guidance on using category rating, please refer to Chapter 5 of the Delegated Examining Operations Handbook, https://www.opetm.gov/policy-data-oversight/hiring-information/competitive-hiring/deo_handbook.

Q6. Where can I find more information on rating and ranking applicants?

A6. The Delegated Examining Operations Handbook, Chapter 5, Section B covers the basic steps in the rating and ranking process for those applicants who meet minimum qualification requirements and any valid/approved selective factors. Applicants who meet eligibility and minimum qualification requirements move to the assessment phase of the hiring process. You may also find Chapter 2 helpful as it includes other assessment methods used to evaluate eligible candidates.

Q7. Can applicants be considered if they do not meet the exact educational requirements outlined in the qualification standard for a particular occupational series (e.g., Occupational Therapy, 0631, Physical Therapy, 0633 and Pharmacy, 0660, etc.)?

A7. Yes. On rare occasions when there are applicants who may not meet the exact educational requirements for a particular series (e.g., the minimum educational requirement is a Doctoral Degree and the applicant possesses a Master’s Degree or a Bachelor’s Degree), agencies may consider further analysis through a more comprehensive evaluation of the applicant’s experience and/or education.

NOTE: OPM Qualification Policy, Sec. 4, para (g) states that, “the individual may be demonstrably well qualified to perform the work in that series based on exceptional experience or a combination of education and experience. However, in such instances, a more comprehensive evaluation must be made of the applicant’s entire background, with full consideration given to both education and experience.”

Q8. How can agencies conduct a comprehensive evaluation of a candidate's entire background described above?

A8. Agencies can solicit the assistance of Subject Matter Experts (SMEs) to serve as panelists to evaluate and verify applicants' resumes; conducting a comparison of competencies and knowledge to duties of the position description of the job being filled. They will provide a final determination and appropriately document whether the applicant(s) has the skills and competencies to be successful in the job. The comparison is based upon a job analysis and a correctly classified position description or OPM position classification standards or grade level criteria.

NOTE: The SME Qualification Assessment uses SMEs, in partnership with HR specialists, to conduct resume review and structured interview assessments before determining an applicant was qualified and applying veterans' preference. This panel must be comprised of at least two SMEs who are equal to or greater in grade/rank/professional standing in the field of the position, and possess expert knowledge about the competencies and proficiency levels that are essential in successfully performing the job. OPM highly encourages agencies to engage the use of SMEs in multiple capacities to include as panelists to judge the candidate's qualifications for the position, conducting job analyses, and conducting structured interviews to screen out applicants not possessing the required qualifications. HR Specialists can serve as advisors to provide HR policies, but they should not be "voting members" on the assessment of candidates. If HR participation on the panel is required, then the type of participation must be clearly defined before the panel commences.

According to the Delegated Examining Operations Handbook, agencies must annotate and document the case file and rating process with the name, title, series, and grade of SMEs who participated in the development and application of the examining plan and rating of applicants. The SME/rater's must initial and date the rating form or documents to verify that the appropriate review of each applicant's background was indeed compared to the duties and responsibilities of the position.

Q9. Can an agency execute its own minimum education requirement for employment in the federal competitive service?

A9. No. Agencies cannot impose minimum educational requirements above those set by OPM. Section 3308 of title 5, U.S.C., prohibits requiring education for positions in the competitive service, unless OPM has determined that an individual who does not have the prescribed minimum education cannot perform the duties of a scientific, technical, or professional position.

Q10. How can agencies identify in the Job Opportunity Announcement (JOA) specific qualifications, such as certifications, in addition to the requirements of the published OPM qualification standard required for an employee to perform successfully in a position?

A10. The use of "Selective Factors" is one way an agency can improve recruitment efforts. By definition, selective factors are knowledge, skills, abilities, or special qualifications used in addition to the minimum requirements in a qualification standard that identify any qualifications that are essential for the job. These are already required when the person starts the job. Agencies **must** document the selective factors in the Job Analysis as proof of the necessity for the specific additional qualification(s) required, which will avoid committing a prohibited personnel practice (review Merit Systems Principles <https://www.mspb.gov/msp/meritsystemsprinciples.htm>). (See OPM General Schedule Qualifications

Policies, section 6, Using Selective Factors <https://www.opm.gov/policy-data-oversight/classification-qualifications/general-schedule-qualification-policies/#url=e6>.

If you are unable to document a selective factor as essential to the candidate's ability to perform the job, you can evaluate its use by using it as a quality-ranking factor. DCPAS, Employment & Compensation Line of Business, recommends the use of quality ranking factors in such instances. (For more information on appropriate use, see Chapter 5 of the Delegated Examining Operations Handbook). Remember that quality-ranking factor(s) **must** also be identified and documented in the job analysis (see Appendix D of the Delegated Examining Operations Handbook).

NOTE: A few things to consider when using selective factors in a JOA:

- ✓ Determine if the selective factor is a requirement for new entrants and current employees unless (1) there are some specific duties that the newly hired employees will be performing that the current employees will NOT be performing; and (2) these specific duties cannot be performed without the credential/certification, the grandfathering approach isn't compatible with a selective factor. With that said, it is possible to have some employees currently assigned to the job (who do not possess the selective factor requirement) performing the work at an acceptable level without the certification.
- ✓ The only "middle ground" or exception might be if the selective factor became valid after a certain date due to a law, regulation, etc., in which case the grandfathering is built-in.
- ✓ Merely placing a selective factor or condition of employment into JOAs is insufficient, because there will be placements which do not require announcements (e.g., noncompetitive placements such as reassignments, changes to lower grade, and certain temporary promotions, as well as noncompetitive appointments).

Q11. What is a "Condition of Employment"?

A11. Fundamentally, condition(s) of employment are those competencies that an employee must possess prior to appointment and/or must continue to maintain during employment to successfully perform their assigned functions/duties.

According to section 7103(a) (14) of title 5, U.S.C., "Conditions of employment" means personnel policies, practices, and matters, whether established by rule, regulation, or otherwise, affecting working conditions. Except that such term does not include policies, practices, and matters (A) relating to political activities prohibited under subchapter III of chapter 73 of this title; (B) relating to the classification of any position; or (C) to the extent such matters are specifically provided for by Federal statute.

NOTE: A few things to consider as it relates to the use of "condition of employment" in a JOA:

- ✓ Condition of employment **must** be supported and documented in the job analysis and/or position description.
- ✓ Agencies requiring a certificate as a condition of employment **must** demonstrate that people without the certification cannot perform the job. The certification only provides information as to whether someone is certified or not certified; it does not differentiate who is more qualified among those who are certified. See the example below:

Certified Public Accountant (CPA) Certificate – This certificate serves as a permit to practice public accounting. To obtain a CPA Certificate a person must:

- Complete a program of study (usually 150 credit hours) in accounting at a college/university;
- Pass the Uniform CPA Examination, which is developed and graded by the American Institute of Certified Public Accountants; and
- Have a certain amount of professional work experience in public accounting).

- ✓ Agencies **must** ensure that the certification or certification program does not unfairly exclude applicants who do not work for the agency, or current employees who are successfully performing the work without possessing the certification (those employees have shown they are otherwise capable of performing the work of the position and have in most cases performed in a fully successfully capacity).
- ✓ Union notification may be required. In certain instances, the use of “conditions of employment” warrant the consultation of DoD’s 12 national unions because this will affect the conditions of employment for bargaining unit employees. In such cases, the DCPAS, Labor and Employee Relations Line of Business, will provide the unions with a 30-day comment period where they are given time to review and provide comments/recommendations on the new policy (e.g., requiring applicants to obtain and maintain a certification by the Pharmacy Technician Certification Board).

Q12. Is there specific language that should be included in the JOA to attract applications who do not meet the exact educational requirements, required degree, certificate or license for a particular series?

A12. There is no required language. Neither OPM nor the Delegated Examining Operations Handbook have specified language that should be used in the JOA or other recruitment efforts in order to invite or attract applicants who may possess years of experience, but lack the required educational degree, certification, or licensure. The sample language below may be helpful as you draft your JOA:

“Applicants who may not exactly meet the educational requirements for this series but who can demonstrate possession of education and/or experience, are encouraged to apply. Applicants should ensure their resumes clearly justify a high evaluation of their competence, such as substantial record of experience, achievement, and/or publications that demonstrates eminence in the appropriate professional/scientific field.”

NOTE: Applicants must provide appropriate documentation to the respective Human Resources Office in order to complete validation requirements.

REFERENCES

The United States Office of Personnel Management (OPM) General Schedule Qualification Policies, <https://www.opm.gov/policy-data-oversight/classification-qualifications/general-schedule-qualification-policies/>

Delegated Examining Operations Handbook, https://www.opm.gov/policy-data-oversight/hiring-information/competitive-hiring/deo_handbook.pdf

President Obama’s memorandum, dated May 11, 2020, “Improving Federal Recruitment and Hiring Process”, <https://obamawhitehouse.archives.gov/the-press-office/presidential-memorandum-improving-federal-recruitment-and-hiring-process>

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