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OFFICE OF THE ASSISTANT SECRETARY OF WAR
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WASHINGTON, D.C. 20301-1500

MAR 18 2026

MEMORANDUM FOR: SEE DISTRIBUTION

SUBJECT: Pathways Programs

References: (a) Title 5, United States Code, Section 362
(b) Department of War Instruction 1400.25, Volume 410, "Training, Education, and Professional Development," September 25, 2013, Incorporating Change 1, Effective August 2, 2021

Pursuant to reference (a) and the policy contained in reference (b), this memorandum provides the Department of War (DoW) guidance on the Pathways Programs. DoW Components will use the attached implementation guidance for the administration and management of the Pathways Programs. The plan provides a standardized and comprehensive resource for the recruitment, appointment, training, and conversion of participants in the Internship Program and Recent Graduates Program.

The Pathways Programs are a critical component of the Department's effort to recruit and hire students and recent graduates. These Programs provide a clear path to Federal internships and careers for individuals at the beginning of their professional lives.

Effective immediately, and until such time as the new Department of War Instruction 1400.25, Volume 362, "DoD Civilian Personnel Manual: Pathways Programs" and associated Handbook are issued, DoW Components will adhere to the attached implementation plan. The implementation plan provides guidance on all aspects of the Programs, including:

- Responsibilities
- Recruitment;
- Training and development;
- Participant Agreements;
- Training and Development; and
- Conversion.

My point of contact is Ms. Robin Farrell who can be reached at robin.e.farrell2.civ@mail.mil.

Michael A. Cogar
Deputy Assistant Secretary of War
Civilian Personnel Policy

Attachment:
As Stated

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IMPLEMENTATION GUIDANCE FOR THE PATHWAYS PROGRAMS

1. Authority.

Pursuant to Executive Order (EO) 13562 and the regulations codified at section 213.3402 and part 362 of Title 5, Code of Federal Regulations (CFR), appointments to the excepted service under the Pathways Programs shall:

- Be made based on merit system principles and veterans' preference.
- Be limited to positions classified at GS-1 through GS-12 (or equivalent).
- Support DoW strategic workforce goals by leveraging the authority provided in part 362 of Title 5, CFR to appoint qualified candidates to covered positions.

2. Roles and Responsibilities.

a. The Deputy Assistant Secretary of War for Civilian Personnel Policy, under the authority, direction, and control of the Assistant Secretary of War for Manpower and Reserve Affairs, and the Undersecretary of War for Personnel and Readiness, shall develop, revise, and monitor DoW policy and implementation of the Pathways Programs.

b. DoW Component Heads.

(1) Comply with applicable laws, regulations, and policies, including Title 5, CFR, and DoW and Component policy and implementation guidance for workforce planning, to include budgets for the training and payroll costs of Programs participants, as well as for projected conversions at the end of their Program appointments.

(2) With independent appointing authority for themselves and their serviced organizations, as defined in their respective DoW chartering directives:

(i) Recruit and appoint qualified individuals to Pathways Programs in accordance with part 362 of Title 5, CFR and this guidance.

(ii) Ensure adequate resources are allocated to support Program execution, including development and implementation of Individual Development Plans (IDPs), assignment of mentors, provision of training and development opportunities, etc.

(iii) Designate a Component Pathways Program Coordinator.

3. Program Components.

a. Internship Program. Provides paid opportunities for students to gain work experience related to their academic field. May be part-time or full-time. Successful completion may lead to non-competitive conversion to the competitive service.

b. Recent Graduates Program. A 1-2 year developmental program for recent graduates from a qualifying educational institution or program. May lead to a non-competitive conversion to term or permanent appointments in the competitive service.

c. Developmental Requirements. Components shall develop and implement IDPs for each participant. Components must assign mentors to employees hired under the Recent Graduate Program and may assign a mentor to Interns. Further, meaningful training and developmental opportunities will be provided that align with the participants' career goals.

d. Non-Competitive Conversion. Participants who successfully complete program requirements may be converted non-competitively to term or permanent appointments consistent with applicable regulations and policies. Conversion of an Intern Not-to-Exceed should be rare and must meet requirements specified in part 362 of Title 5, CFR.

4. Program Coverage and Eligibility.

a. The Pathways Programs apply to positions classified at GS-1 through GS-12, or equivalent under other pay systems. Applicants must meet eligibility criteria established in part 362 of Title 5, CFR and DoW policy, including enrollment or recent graduation from a qualifying educational institution or program.

b. To be eligible for appointment as a Recent Graduate, applicants must have graduated from a qualifying educational institution or career or technical education program within the previous 2 years. Applications must be received before the 2 years expire. Veterans, as defined in Section 2108 of Title 5, U.S.C., who could not apply during the 2-year window due to military service, have a full 2-year eligibility period upon discharge, not extending beyond 6 years post-completion of their academic requirements.

c. Interns and Interns not-to-exceed (NTE) must:

- Be enrolled or accepted for enrollment and seeking a degree or certificate in a qualifying educational institution on a half- to full-time basis (as determined by the educational institution).
- Meet the definition of a student throughout the duration of the appointment.
- Meet Component-specific requirements as specified in the established Participant Agreement.
- Meet the qualification standards (e.g., series and grade) for the internship position.

(1) In addition to the above, Components may apply requirements such as the ability to work a specified number of hours per week or remain in good academic standing as eligibility criteria. Any additional requirements must be specified in the job opportunity announcement (JOA) and/or the Participant Agreement. However, Components may not require

educational requirements for specific coursework for occupations that do not have positive education requirements specific to the occupational series being hired

(2) Eligibility for the Pathways Internship also includes those with or without formal degrees who have completed “qualifying career or technical education programs” (which may include Registered Apprenticeship Programs, Job Corps, AmeriCorps, and Peace Corps).

5. Vacancy Announcements and Certifying Applicants.

a. Vacancy announcements will be posted on the U.S. Office of Personnel Management’s (OPM) USAJOBS website for all Intern and Recent Graduate positions. If using USAJOBS custom announcements, the link must appear on the Component’s public facing website and/or the DoW’s Civilian Careers website. Additionally, postings on third-party websites, consistent with merit system principles, may be used to supplement postings made on either USAJOBS or Component/DoW website.

b. Applications will only be accepted through USAJOBS. Candidates will be assessed based on basic eligibility using OPM qualification standards and in accordance with the requirements in part 302 of title 5, CFR. However, for Interns, DoW Components may establish agency-specific qualification requirements, use the OPM qualification standard for Schedule D Pathways Internship positions or use the OPM qualification requirements for the competitive service.

c. Components may use a category-like rating or the “Rule of Many” to certify qualified candidates. The category-like rating works the same way as category rating does in the competitive service. Applicants are assessed against established criteria and placed in one of two or more pre-defined quality categories. Veterans’ preference will be applied in accordance with part 302 of title 5, CFR. A pass over request for a preference eligible veteran may be submitted following the procedures outlined in sections 332.406(c) and 302.401(b) of title 5, CFR.

d. Intern positions announced with NTE dates are for temporary, short-term use only, such as summer employment programs. These NTE positions will not be used for subsequent noncompetitive conversions to other Pathway Programs appointments.

6. Formal Training and Development.

a. DoW Components will adhere to part 362 of title 5, CFR, in the design and implementation of a formal training and development plan within 45 days of the participant’s appointment as a Pathways Intern or Recent Graduate. The design and implementation of the training will vary based on the position’s requirements and specific to the participant.

b. Appropriate training and development activities will be provided to Interns regardless of the length of appointment. Interns appointed for short-term temporary work not exceeding 90 days, such as summer jobs, are not required to have a formal training and development plan. Completed training will be documented in the intern’s record.

c. Training for Recent Graduates will consist of at least 40 hours of interactive formal training per year. Additionally, training plans may include projects and developmental assignments, as appropriate.

d. Mentors will be assigned to Recent Graduates within 90 days of appointment. Assigning mentors to Interns is highly recommended, especially for Interns on appointments lasting one year or longer.

7. Participant Agreement.

Components must enter into written agreements with each Pathways participant employed. These agreements are usually signed by a Human Resources professional, hiring manager, or supervisor, along with the participant. Components have the flexibility to customize Participant Agreements for each Program. However, each agreement must outline expectations and include the following elements:

- A general description of the duties to be performed.
- Work schedule.
- Length of the appointment and termination date.
- Mentorship opportunities.
- Training requirements.
- Evaluation procedures.
- Criteria for continuation and successful completion of the Program.
- Minimum eligibility requirements for non-competitive conversion to a term or permanent position in the competitive service.
- Any additional requirements or expectations set by the Component.

8. Conversion.

a. Components have the discretion to non-competitively convert any Pathways participant who has fulfilled Program requirements to a term or permanent position in the competitive service, subject to any OPM-imposed conversion limitations, provided this option was clearly outlined in the Pathways JOA. A Pathways participant converted to a term appointment in the competitive service may be transitioned to a permanent position at any time before the term appointment expires.

b. As defined in EO 13562, the Schedule D appointing authority was designed to serve as an exception to the standard competitive hiring process. Therefore, non-competitive conversion refers to an assignment in the competitive service. The EO and its implementing

regulations do not allow for conversion to an excepted service position for participants in any of the Programs.

c. Interns NTE will not be converted to the competitive service. However, Interns NTE may compete for longer-term or indefinite internship positions. Legal Interns NTE may be considered for excepted service appointments pursuant to sections 213.3102(d) or (e) of Title 5, CFR, as applicable.