



February 3, 2004

Ms. Leah M. Meisel
Deputy Associate Director
Center for Talent and Capacity Policy
U.S. Office of Personnel Management
1900 E Street, NW
Room 6500
Washington, DC 20415

Dear Ms. Meisel,

We, the executive officers of the Council of Federal EEO and Civil Rights Executives, submit the following comments to the proposed regulations modifying the Presidential Management Intern (PMI) Program that the Office of Personnel Management (OPM) published in the Federal Register on January 26, 2004.

Following is a list of our recommendations:

- 1) Add the following information to section 5 C.F.R. 362.201. OPM will collect race/national origin information for all stages of the Fellows and Senior Fellows programs from the nomination/application process to the graduation/termination stage. This information will be collected annually and will be posted on the OPM webpage. The collection of this data is in keeping with the goal articulated by OPM's Director Kay Cole James to hire and retain a truly diverse Federal workforce. Additionally, OPM will collect this information from all participating agencies annually and post it on the OPM webpage. Finally, OPM will send lists of finalists for consideration by race/national origin to all federal agencies that participate in this program.
- 2) Remove the provision of 5 C.F.R. 362.202(b)(2)(iv) that requires a Fellow to be officially nominated by the dean, chairperson, or academic program directors. Substitute this requirement by allowing Fellows to self-nominate themselves, as long as they are able to provide OPM with proof that they are graduate students who have completed or expect to complete by August 31 of the academic year an advanced degree from a qualifying college or university. This will enhance the diversity of the applicant pool.

3) Add the following provision to 5 C.F.R. 362.202(c)(2)(I): The OPM Director will ensure the make-up of the Senior Presidential Management Fellows Selection Committee reflects the diversity of the Nation.

4) Add the following provision to 5 C.F.R. 362.203(a)(2)(ii): Agencies will ensure their Executive Resources Board reflect the diversity of the Nation by submitting the race/national origin data to OPM annually.

5) Add 5 C.F.R. 362.203(b)(iv): OPM will list the U.S. Citizenship status when preparing the list of Fellow and Senior Fellow finalists for consideration.

6) Add the following provision to 5 C.F.R. 362.204©(3): If a Fellow or Senior Fellow does not meet the expectations of his/her development plan, the agency may take appropriate corrective action, including putting the employee in his/her previous career/career-conditional position or a comparable one.

If you have any questions about these recommendations, please do not hesitate to call Jorge Ponce at (202) 482-8185 or Delia Johnson at (202) 619-5157.

Sincerely,
Jorge E. Ponce & Delia L. Johnson
Co-Chairs
Council of Federal EEO & Civil Rights Executives