



May 6, 2005

E-Mailed to [Employ@opm.gov](mailto:Employ@opm.gov)

RIN 3206-AK59

Following are the recommendations from the Council of Federal EEO and Civil Rights Executives to the proposed OPM rules to modify the Student Career Experience Program (SCEP), as indicated in the March 16, 2005 edition of the Federal Register.

1) The Council applauds OPM for allowing federal agencies to waive up to 320 hours of the 640-hour minimum service requirement for participating in a non-Federal, work program through an internship provider. This way, federal managers will get an opportunity to test the skills of the interns, and, if impressed, will be able to convert the interns to SCEP appointments immediately. It makes no sense for these managers to continue hiring these students as interns repeatedly after they are impressed with their talents.

2) One of the requirements for noncompetitive conversion is that the students must have graduated with at least a 3.5 GPA or better on a 4.0 scale or with a standing in the top 10 percent of the student's graduating class. Considering that minority students have to hold at least one job while attending college (unlike most non-minority students who do not work while attending college), it is a significant achievement for them to graduate. Thus, the Council recommends that the GPA requirement be lowered to 3.0, and the class standing be lowered to the top 20 percent.

Thanks for the opportunity to comment on these proposed rules.

Sincerely,

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

Re: Proposed rules --

<http://a257.g.akamaitech.net/7/257/2422/01jan20051800/edocket.access.gpo.gov/2005/05-5179.htm>