



LOCAL 777

INTERNATIONAL FEDERATION OF PROFESSIONAL & TECHNICAL ENGINEERS, AFL-CIO
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June 12, 2026

via www.regulations.gov

Re: Elimination of Time-in-Grade
Docket ID: OPM-2026-0067
RIN 3206-AP05

IFPTE Local 777 appreciates the opportunity to comment on OPM's proposal to eliminate Time-in-Grade (TIG) requirements.

Our union represents federal employees who operate, maintain, and support critical public infrastructure and government services. We understand that employees should be recognized and rewarded based on their qualifications, skills, performance, and ability to do the work. We also recognize that there are situations where an employee may be fully capable of performing at a higher grade before reaching 52 weeks in their current position.

For that reason, we do not oppose efforts to modernize the federal personnel system or provide agencies with flexibility to promote qualified employees.

However, we are concerned that this proposal removes one of the few objective standards employees can easily understand and replaces it with significantly more management discretion.

Time-in-Grade is not perfect, but it is clear. Employees know what the requirement is, and they know it applies equally to everyone. That consistency helps build confidence that advancement opportunities are being administered fairly.

Without that objective standard, employees are left wondering why one employee advanced while another did not. Was the decision based on qualifications and performance? Were the same standards applied to everyone? Did all employees have the same opportunity to compete?

Those questions matter because trust in the merit system matters.

At a time when many federal employees are facing workforce reductions, reorganizations, hiring restrictions, and uncertainty regarding long-standing workplace protections and collective bargaining rights, OPM should be cautious about removing objective standards that employees view as safeguards against inconsistent treatment. Employees are being asked to place greater trust in management discretion at the same time many are questioning whether traditional protections and independent review processes will remain available when needed.

OPM states that merit system principles, prohibited personnel practices, and existing oversight mechanisms provide adequate safeguards. In theory, that is true. In practice, those protections often come into play only after an employee believes something unfair has already happened.

Employees are frequently told they can file a grievance, seek assistance from the Office of Special Counsel, appeal to the Merit Systems Protection Board, or pursue matters through the Federal Labor Relations Authority. Unfortunately, those processes can take months or years to resolve. Employees have also witnessed periods where these institutions have struggled with vacancies, backlogs, funding limitations, jurisdictional challenges, and other operational obstacles that delayed meaningful review. A protection that exists only after the damage is done is not the same as preventing the problem in the first place.

The better approach is to build transparency and accountability into the process from the beginning.

If OPM moves forward with eliminating Time-in-Grade, we strongly recommend requiring agencies to establish clear written promotion criteria, communicate those standards to employees in advance, and document the reasons promotion decisions are made. Employees should know what qualifications, competencies, and performance expectations are required for advancement.

Federal employees should not have to guess what it takes to move forward in their careers. Advancement should be based on merit, not office politics, personal relationships, or inconsistent application of standards.

Our members support merit-based advancement. They support rewarding employees who demonstrate the skills and ability to perform at a higher level. What they do not support is replacing an objective standard with a system that relies primarily on management discretion without meaningful safeguards, transparency, and accountability.

The federal workforce is strongest when employees believe the rules are fair, consistently applied, and based on merit. Any final rule should strengthen those principles rather than weaken them.

Sincerely,
David A. Wisniewski
Chief Steward