



March 26, 2026

The Honorable Scott Kupor  
Director  
Office of Personnel Management  
1900 E Street, NW  
Washington, DC 20415

**Re: 5 CFR Part 430  
[Docket ID: OPM-2025-0273]  
RIN 3206-AP06**

**Performance Appraisal for General Schedule,  
Prevailing Rate, and Certain Other Employees**

Dear Office of Personnel Management:

On behalf of the managers, supervisors and executives currently serving our nation in the federal government, and whose interests are represented by the Federal Managers Association (FMA), I submit our response to the Office of Personnel Management's (OPM) proposed rule in the Federal Register Vol. 91, No. 36 (February 24, 2026), RIN 3206-AP06, affecting 5 CFR Part 430, regarding Performance Appraisal for General Schedule, Prevailing Rate, and Certain Other Employees.

I am writing to express support for OPM's efforts to strengthen performance management across the federal workforce, while also raising concerns about the potential use of rigid or arbitrary rating distributions within the proposed rule.

Improving accountability, reinforcing a culture of high performance, and ensuring meaningful differentiation in evaluations are important and worthwhile goals FMA supports. A well-designed performance management system can help recognize excellence, address underperformance, and better align individual contributions with agency missions.

However, any approach that relies on fixed or forced distributions of ratings risks introducing unnecessary rigidity into what should be a thoughtful and evidence-based process. Requiring managers to fit employees into predetermined categories, regardless of actual performance levels, can undermine the credibility of evaluations and reduce trust in the system.

Performance varies across teams, functions, and time periods. In some cases, a team may consist largely of high performers; in others, performance may be more mixed. A system that does not allow ratings to reflect these realities may lead to artificially inflated or deflated assessments, rather than accurate evaluations based on merit.

There is also concern that arbitrary constraints could unintentionally discourage collaboration. If employees perceive that their success is limited by quotas rather than actual achievement, it may shift focus away from shared mission outcomes and toward internal competition.

To advance the stated goals of the proposed rulemaking, OPM should consider approaches that:

- Allow flexibility for rating distributions to reflect actual performance
- Emphasize clear, objective performance criteria and measurable outcomes
- Support ongoing feedback and employee development
- Preserve managerial discretion while maintaining accountability and oversight

A performance management system will be most effective when it is seen as fair, transparent, and grounded in real performance—not constrained by predetermined limits.

Thank you for the opportunity to provide input on this important effort.

Respectfully submitted,

Linda S. Lentjes  
National President