
Approved for Release
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Date

DEPARTMENT OF COMMERCE
OFFICE OF HUMAN RESOURCES MANAGEMENT
HUMAN RESOURCES (HR) BULLETIN #272, FY26

SUBJECT: Implementation of the Department of Commerce’s Annual Staffing Plan

EFFECTIVE DATE: Upon release of this HR Bulletin

EXPIRATION DATE: Effective until canceled or superseded

SUPERSEDES: None

BACKGROUND: The October 15, 2025, Executive Order 14356, titled “*Ensuring Continued Accountability in Federal Hiring,*” and the subsequent November 5, 2025, “*Guidance on Executive Order 14356, Ensuring Continued Accountability in Federal Hiring,*” issued by the Office of Personnel Management (OPM) and the Office of Management and Budget (OMB) build upon the Administration’s prior Workforce Optimization Initiatives by directing agencies to comply with OPM’s Merit Hiring Plan and establish Strategic Hiring Committees to ensure agency hiring is consistent with the national interest, agency needs, and Administration priorities. Collectively, these initiatives mandate that agencies establish policies ensuring that no federal position is filled or created without approval under strict merit and strategic review processes. The Department of Commerce (Department) must also prioritize hiring in program areas, projects, and positions that support national security, immigration enforcement, and public safety activities; emphasize hiring early-career talent; and promote maximum use of pooled hiring flexibilities.

PURPOSE: This bulletin establishes the governance and operational processes by which Departmental Offices and operating units (bureaus) will develop, align, and execute Bureau Staffing Plans (BSP) and Bureau Hiring Plans (BHP) in support of the Department’s Annual Staffing Plan. The bulletin outlines how to make requests, amendments, and receive approval to fill vacancies under the plan.

DEFINITIONS, ROLES, AND RESPONSIBILITIES:

Annual Staffing Plan: This plan ensures that appointments¹ in the upcoming fiscal year are in the highest-needed areas and aligned with the priorities of the Administration. Each fiscal year,

¹ Appointment refers to any actions that result in the filling of a position including hiring actions, reassignments, etc.

the Department will submit an Annual Staffing Plan to OPM and OMB. The Department's Annual Staffing Plan shall consist of content compiled from Bureau Staffing Plans, which will be subdivided at the Department Organizational Order (DOO) level, which is captured at the operating unit (bureau) level. The Annual Staffing Plan will demonstrate the Department's commitment to:

- improve operational efficiency;
- eliminate duplicative or unnecessary functions and positions;
- reduce unnecessary or low-value contractor positions;
- promote employee accountability;
- enhance the delivery of essential services;
- prioritize hiring for national security, homeland security, and public safety positions; and
- implement the recruitment initiatives described in the Merit Hiring Plan.

The Department's Annual Staffing Plan may be updated throughout the year to address the enactment of relevant legislation. The Department may also amend the plan in coordination with OPM and OMB. The Department will submit quarterly updates to OPM and OMB to ensure appointments in the upcoming fiscal year are in the highest-need areas.

Agency Staffing Plan (ASP): An outline of the current and future state staffing composition for the Department, based upon the staffing needs outlined in the Bureau Staffing Plans.

Agency Strategic Hiring Committee (ASHC): The ASHC is made up of Department senior officials as designated by the Department head. The ASHC reviews Bureau Staffing Plans to ensure compliance with the intent of the Executive Order, and OPM and OMB supplemental guidance. The ASHC shall work with OPM and OMB on a quarterly basis on any revisions to the Agency Staffing Plan.

Bureau Staffing Plan (BSP): A plan that outlines both the current and future state of bureau-level staffing, broken out by Organizational Component Composition, along with any necessary and relevant narrative justifications and explanations. BSPs should be coordinated with budget components prior to submission to the Department. The BSP is composed of current staff counts and the staffing requirements contained in the Bureau Hiring Plan. An approved plan establishes headcount ceilings within specific categories in organizations, authorizing bureaus to take appropriate hiring actions, as long as doing so does not exceed the ceiling. Should a ceiling need to be adjusted, amendment requests should be submitted to update the BSP.

Bureau Hiring Plan (BHP): A subcomponent of the BSP that includes the list of current vacancies the bureau intends to fill during the fiscal year to reach the full staffing levels included in the BSP. The BHP supports the Organizational Component Composition approved in the BSP. Each plan shall be reviewed and approved by the Bureau Strategic Hiring Committees (BSHC). Plans must be provided by the BSHC to the ASHC on a quarterly basis. The BHP can be amended without the need for approval.

Bureau Strategic Hiring Committees (BSHC): A committee established within each bureau that is responsible for reviewing and approving the bureau-level staffing plan. The BSHC Chair or other representative(s) will provide annual and quarterly briefings to the ASHC regarding the

BSP. The BSHC is chaired by the bureau's political leadership and is composed of bureau representative(s).

Organizational Component Composition: A categorization of the organization that consists of two primary elements as outlined below. Unless otherwise directed by the ASHC, for Departmental Offices (as identified by Department Organizational Order - DOO), the entire Office is a single organization. For bureaus and operating units, each organization identified by name within the establishing DOO shall be individually categorized, unless otherwise directed by the ASHC. Organizational Component Composition includes all bureau-level entities under the Department and their underlying sub-units as identified in the DOO.

- Count of full-time positions within each Occupational Group and Family (as defined by the [*OPM Handbook of Occupational Groups and Families*](#)).
- Count of full-time positions by Grade/Band Level categorized as follows:
 - Executive-Level: SES, ST, SL, AD or equivalent
 - Senior-Level: GS-15 or equivalent
 - Mid-Level: GS-11 through GS-14 or equivalent
 - Entry-Level: GS-9 and below or equivalent²

Note: Unless otherwise noted, bureaus should only account for full-time permanent and term positions in their staffing/hiring plans. Non-full-time positions and term positions, including part-time and intermittent work schedules, shall be included in the "less than full-time positions" portion of the staffing/hiring plan when the number of such positions in any given organization exceeds five.

Principal Human Resources Managers (PHRMs): Human resources (HR) managers, designated in [Department Administrative Order \(DAO\) 202-250, "Delegation of Authority for Human Resources Management,"](#) who provide HR management advice and support to heads of operating units/bureaus in the development of personnel management policies and programs and in executing the delivery of HR services. The appropriate PHRM will serve as an advisory member of the BSHC.

BSP AND BHP APPROVAL PROCESS:

1. Guided by Congressional appropriations, statutory obligations, Administration directives and priorities, and Department or bureau political leadership. Each bureau develops a BSP and a BHP. The BSP and BHP, which are batched by Organizational Component, pay plan categorization, and occupational group and family, constitute the totality of existing and future vacancies that a bureau will be authorized to create and fill.
2. The BSP and BHP request is reviewed, modified as necessary, and ultimately approved by the BSHC.
3. The BSHC submits annual and quarterly updates to the ASHC for approval and submission to OPM and OMB (as necessary).
4. Approved BSPs are transmitted to the BSHC for execution.

² The Department has a goal of filling one-third of new hires with early-career professionals, consistent with the Merit Hiring Plan and mission needs.

5. Organizations execute their BSPs through hiring actions, reassignments, and other related personnel actions. Unless otherwise directed by the ASHC, BSHCs or their designees, are authorized to make non-substantive changes³ to their BHPs as needed without further approval from the ASHC.
6. BSPs and BHPs are updated and provided to the ASHC on a quarterly basis.

BUREAU AND AGENCY ENGAGEMENT ON CANDIDATE SELECTIONS:⁴

1. The BSHC shall have the following engagement on candidate selections for positions within their bureau or operating unit:
 - a. **For all Executive-Level positions**, the BSHC shall conduct a resume review and final “executive interview.”
 - b. **For all Schedule Policy/Career positions** within their bureau or operating unit, the BSHC shall conduct a resume review.
 - c. **For all other positions** within their bureau or operating unit, the BSHC shall develop a framework for resume reviews consistent with position requirements and operational needs. This may include designating authority in the form of a memorandum.
2. The ASHC shall have the following engagement on candidate selections for positions within the Department:
 - a. **For all Executive-Level positions within the Department that directly report to a non-career position**, the ASHC shall conduct a resume review and final “executive interview”.
 - b. **For all Schedule Policy/Career positions within the Department that directly report to a non-career position**, the ASHC shall conduct a resume review.
3. The ASHC may identify additional positions requiring BSHC and/or ASHC approval prior to the creation and/or filling of such vacancies.
4. PHRMs will provide all locked/restricted New Hire Records in USA Staffing to the Office of Human Resources Management (OHRM). By providing New Hire Records for unlocking, bureau components are confirming that appropriate agency leadership engagement has occurred for all selections.
5. OHRM will review all locked/restricted New Hire Records in USA Staffing to confirm that the hires are consistent with the approved BSP. Any hiring actions that would result in exceeding the composition limits will be held pending ASHC/BSHC consultation.

DATA MANAGEMENT

OHRM will develop an agency dashboard using common sources of data that compare in near real-time the staffing composition approved in the BHP against the current staffing composition.

³ Any personnel actions or activities that will result in a change to an approved future state DOO Component Composition (i.e. ceiling), constitutes a substantive change to the BHP, and requires an amendment to the BSP that must be approved by the ASHC in the same manner as the initial annual plan.

⁴ Consistent with requirements outlined in Section D.3: “Realigning Roles and Responsibilities in the Federal Hiring Process - Agency Leadership” of May 29, 2025, Memorandum issued by OPM titled “Merit Hiring Plan.”

OHRM will provide the BSHCs and appropriately delegated individuals with access to their dashboard and will allow a one-week period for bureaus to provide feedback on the data. OHRM will provide the ASHC with the agency dashboard once bureaus have had an opportunity to submit feedback.

REFERENCES:

- Executive Order 14356: “[*Ensuring Continued Accountability in Federal Hiring*](#),” October 15, 2025.
- “[*Guidance on Executive Order 14356, Ensuring Continued Accountability in Federal Hiring*](#),” November 5, 2025.
- “[*Memorandum: Merit Hiring Plan*](#),” May 29, 2025.
- “[*Guidance on Agency Leadership Involvement in Implementing the Merit Hiring Plan*](#),” February 2026.

OFFICE OF TALENT POLICY: TalentPolicy@doc.gov.