



U.S. General Services Administration (GSA)

GSA Order: Rule of Many and Selection Procedures

HRM 9370.1A

Office of Human Resources Management

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Purpose:

This Order issues and transmits General Services Administration (GSA) policy governing the use of the Rule of Many and Selection Procedures.

Background:

Pursuant to [5 USC 3317](#) and [3318](#) and implementing regulations at [5 CFR part 332](#), the U.S. Office of Personnel Management (OPM) issued the final rule titled "[Reinvigorating Merit-Based Hiring through Candidate Ranking in the Competitive and Excepted Service](#)," published in the *Federal Register* on September 8, 2025, consistent with the [Merit Hiring Plan](#) dated May 29, 2025.

The Rule of Many is intended to modernize Federal hiring by establishing a numerical ranking referral and selection procedure that allows agencies to refer and consider more than three closely ranked candidates at the top of a competitive certificate, replacing the traditional Rule of Three, while preserving veterans' preference. The Rule of Many supports merit-based hiring through validated, skills-based assessments, expands the pool of qualified applicants, and provides flexibility for hiring managers to make better distinctions among candidates based on final rating and ranking scores. The process applies to both competitive selection and certain excepted service hiring authorities, permits referral of eligible candidates with the same or indistinguishable scores, and allows selection from a predetermined number of the highest-ranked qualified candidates.

Applicability:

1. This order applies to all GSA appointing offices and will be utilized when filling:
 - 1.1 Competitive service positions when competitive examining procedures are used (in accordance with [5 CFR 337](#)), and
 - 1.2 Pathways Recent Graduate and Intern positions in the excepted service when candidate ranking is used (in accordance with [5 CFR Part 302](#) and [5 CFR 362](#))
2. The Office of Inspector General (OIG) has independent personnel authority. See Section 6 of the Inspector General Act of 1978, (5 U.S.C. App.3), as amended

(Inspector General is authorized “to select, appoint, and employ such officers and employees as may be necessary for carrying out the functions, powers, and duties of the Office of Inspector General”) and GSA Order ADM 5450.39D CHGE 1 GSA Delegations of Authority Manual (Delegations Manual), Chapter 2, Part 1 (“the Inspector General has independent authority to formulate policies and make determinations concerning human capital issues within the [OIG]” and GSA determinations/delegations do not limit that authority). Similarly, GSA specifically recognizes that the Inspector General has independent authority to formulate policies and make determinations concerning training, employee development, and career management.

3. This Order only applies to the Civilian Board of Contract Appeals (CBCA) to the extent that the CBCA determines it is consistent with the CBCA’s independent authority under the Contract Disputes Act and it does not conflict with other CBCA policies or the CBCA’s mission.

Signature

/S/ _____
Arron E. Helm
Chief Human Capital Officer
Office of Human Resources Management

3/5/2026 _____
Date

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1. Introduction

This Order outlines the policy for implementing the Rule of Many referral and selection methodology when conducting recruitment under delegated examining procedures and applicable excepted service authorities. It outlines requirements for referral mechanisms, certificate construction and issuance, application of veterans' preference and order of selection provisions, and documentation standards necessary to support consistent, transparent, and defensible hiring actions.

2. References

- 2.1 [5 USC 3317 Competitive Service; certification from registers](#)
- 2.2 [5 USC 3318 Competitive Service; selection from certificates](#)
- 2.3 [5 USC 2301 Merit System Principles](#)
- 2.4 [5 CFR part 332 Recruitment and Selection through Competitive Examination](#)
- 2.5 [Delegated Examining Operations Handbook \(DEOH\)](#)
- 2.6 [OPM's Vet Guide for HR Professionals](#)
- 2.7 [*OPM Final Rule, Reinvigorating Merit-Based Hiring through Candidate Ranking in the Competitive and Excepted Service dated September 8, 2025*](#)
- 2.8 [*Merit Hiring Plan dated May 29, 2025*](#)
- 2.9 [GSA Order for Veteran Pass Over and Objection Requirements and Procedures](#)
- 2.10 [GSA Order Delegated Examining Policy](#)

3. Definitions

- 3.1 **Bona Fide Consideration** is a documented review of an applicant's qualifications and materials by a selecting official or hiring manager as part of a legitimate selection decision. Bona fide considerations may be tracked for application of the three considerations rule as set forth in [5 CFR 332.405](#).
- 3.2 **Business Necessity** is a demonstrable operational need that justifies establishing a referral threshold or cut score under the Rule of Many to support efficient and effective hiring operations. Business necessity must be job-related, supported by objective rationale, and documented in the case file. Examples may include managing high applicant volume, limiting advancement to resource-intensive assessment stages (e.g., structured interviews or work samples), or ensuring the referral group remains at a size that can be

meaningfully evaluated by hiring officials while maintaining compliance with merit system principles and veterans' preference requirements.

- 3.3 Certificate of Eligibles (Certificate)** is the ranked list of qualified candidates issued for selection consideration under delegated examining or applicable hiring authorities.
- 3.4 Cut Score (cut-off score)** is a minimum passing score established through job analysis or supported by business necessity to determine which candidates are referred or advance in the selection process.
- 3.5 Mechanism (Referral Mechanism)** is the method selected under [5 CFR 332.402](#) to determine which candidates are referred for selection consideration (e.g., cut score based on assessment, cut score based on business necessity, set number, or percentage of highest-ranked candidates).
- 3.6 Numerical Ranking** is the process by which applicants are assigned final scores, including veterans' preference augmentation where applicable, and listed in rank order for referral and selection consideration.
- 3.7 Rule of Many** is a candidate ranking and referral methodology that permits agencies to refer and consider more than three closely ranked eligible candidates at the top of a certificate, based on final scores, in accordance with [5 USC 3317, 3318](#) and [5 CFR part 332](#).
- 3.8 Same or Similar Position** for purposes of applying the three consideration rule means a position with the same title, series and grade that is substantially alike in duties, knowledge, skills and abilities (KSAs), and work environment.
- 3.9 Simultaneous Listing** is the referral of eligible candidates on multiple certificates for which they are interested, eligible, and within reach, unless otherwise determined necessary for good administration.
- 3.10 Supplement Strategy** is a pre-determined and documented contingency approach established prior to posting the Job Opportunity Announcement (JOA) that identifies how the referral mechanism may be adjusted if the initial mechanism does not produce a sufficient number of eligible and available candidates for consideration. A supplement strategy may include transitioning from one approved referral mechanism to another (e.g., from a job-analysis-based cut score to a business-necessity cut score or a set-number referral). The supplement strategy must be identified in the JOA and case file before announcement posting and may not be applied retroactively or altered after candidate assessment results are known.
- 3.11 Three Considerations Rule** is the provision that allows removal of a candidate from further consideration for the same or similar position (see

definition above) after receiving three documented bona fide considerations, when applied in accordance with regulatory requirements and agency policy.

3.12 Tie (Tie Score / Line of Demarcation) is a situation in which two or more candidates have the same final score at the referral cutoff point; all tied candidates must be included when establishing the referral group.

3.13 Within Reach are applicants whose final numerical score places them inside the pre-established referral group under the selected Rule of Many mechanism, including those tied at the cutoff score.

4. Responsibilities

4.1 The Talent Acquisition Center (TAC) Director, Office of Human Resources Management (OHRM) is responsible for:

4.1.1 Providing oversight and strategic direction for implementation of the Rule of Many referral and selection methodology across delegated examining and applicable excepted service recruitment actions.

4.1.2 Providing oversight and guidance, when necessary, for removal requests under the three considerations rule, ensuring decisions are supported by sufficient documentation and aligned with regulatory and merit system requirements.

4.1.3 Ensuring pass-over procedures are applied when required and that documentation supporting referral and selection decisions is sufficient and compliant with regulatory and agency requirements.

4.2 The OHRM TAC Oversight and Quality Assurance Office, Staffing Policy Specialist is responsible for:

4.2.1 Developing, maintaining, and updating GSA policy governing the use of the Rule of Many in accordance with applicable laws, regulations, and OPM guidance.

4.2.2 Providing policy guidance, training and communicating utilization requirements to TAC staff; serves as the primary point of contact for interpretation and implementation support.

4.2.3 Providing oversight and guidance for removal requests under the three considerations rule, ensuring decisions are supported by sufficient documentation and aligned with regulatory and merit system requirements.

4.2.4 Providing advisory guidance on pass-over actions, objections, and the defensibility of referral mechanisms, cut scores, and assessment methodologies to ensure compliance with [GSA Order for Veteran Pass Over](#)

[and Objection Requirements and Procedures](#), regulatory requirements and merit system principles.

4.3 The OHRM TAC Branch Chief is responsible for:

4.3.1 Providing oversight for implementation and application of the Rule of Many within their assigned organizational area.

4.3.2 Providing leadership, direction, and technical guidance to HR Specialists and staff responsible for executing Rule of Many recruitment activities ensuring compliance with all requirements outlined in this Order and applicable regulatory guidance.

4.3.3 Serving as the final approving authority for removal requests under the three considerations rule, ensuring decisions are supported by sufficient documentation and ensuring requests are supported by clear, job-related rationale.

4.4 The OHRM Servicing Human Resources (HR) Specialist is responsible for:

4.4.1 Providing consultative and advisory guidance to hiring managers on when use of the Rule of Many is appropriate and how the methodology is applied within the recruitment process.

4.4.2 Documenting the job analysis results, providing technical consultation on the appropriate Rule of Many referral mechanism, and documenting the rationale for the chosen mechanism; drafting JOA language consistent with regulatory and policy requirements.

4.4.3 Constructing, issuing, and auditing certificates of eligibles, ensuring proper tie handling and adherence to minimum candidate sufficiency requirements.

4.4.4 Reviewing and processing hiring official requests for removal under the three considerations rule; validating documentation for completeness and regulatory sufficiency and elevating requests to the TAC Branch Chief for final determination.

4.4.5 Applying [DEOH Chapter 6](#) guidance when implementing supplemental certificates or adjustments to referral groups, and maintaining a complete and accurate case file in accordance with documentation standards.

4.5 The Services and Staff Offices Hiring Officials are responsible for:

4.5.1 Reviewing referred candidates, applying the same, objectively documented set of evaluation criteria to all referred candidates to ensure equal and merit-based bona fide consideration, and making selection decisions in accordance with merit system principles and this Order; ensuring

consideration and selection decisions are appropriately documented.

4.5.2 Requesting removal of candidates under the three considerations rule, when warranted, and providing a clear, job-related rationale identifying specific skills or attributes that do not meet position requirements. The hiring official is responsible for documenting the three bona fide considerations supporting the request, including when the candidate was considered during the recruitment and the associated selection decisions.

5. Certification and Training Requirements

5.1 HR Specialists who use Rule of Many to conduct delegated examining activities, must complete the Office of Personnel Management (OPM) certification requirements, including training and passing a comprehensive certification (or recertification) assessment.

5.2 The TAC Oversight and Quality Assurance Office, Staffing Policy Specialist, will facilitate training and implementation guidance to managers, supervisors, and HR staff on Rule of Many requirements and expectations, including the four referral mechanisms, veterans' preference and pass-over procedures, the three considerations rule, shared certificates, and applicable documentation requirements.

5.3 Selecting officials must complete mandatory training on the appropriate use and application of the Rule of Many mechanisms prior to participating in recruitment actions utilizing this methodology. The servicing HR Specialist will provide the information contained in [Appendix A](#) and review key concepts with the hiring manager during the strategic recruitment conversation.

6. Selecting the Referral Mechanism

Referral mechanisms must be selected and documented prior to posting the JOA. Referral mechanisms may not be selected, modified, or adjusted based on knowledge of applicant scores, demographics, preference status, or other applicant data. Hiring officials may not request modification of an issued referral group except through a pre-announced supplement strategy or other regulatory procedure.

The HR Specialist should consider factors such as the number of vacancies, anticipated applicant volume, labor-market conditions, and assessment design when determining the appropriate mechanism. In consultation with the hiring manager and informed by job analysis results, workforce data, and current HR system capabilities, the HR specialist will select the most appropriate Rule of Many referral mechanism. The selected mechanism must be documented in the Job Analysis, stored in the case file and clearly identified within the JOA. Referral mechanisms should be established with the goal of providing a sufficient number of qualified candidates for consideration, when available, supporting at least three candidates per vacancy. The following referral mechanisms may be used:

6.1 Mechanism A: Job Analysis Cut Score. A minimum passing score established based on job analysis findings and assessment design. The cut score must be supported by documented job analysis evidence, including identification of critical competencies, linkage between assessment content and job requirements, subject matter expert input, and a documented rationale demonstrating job-relatedness and consistency with merit system principles.

6.1.1 An example where use of this mechanism would be advantageous is a position requiring specialized technical competencies establishes a minimum passing score supported by job analysis findings to ensure only candidates demonstrating essential knowledge and skills are referred.

6.2 Mechanism B: Business Necessity Cut Score. A minimum passing score established based on documented business necessity, such as managing high applicant volume or limiting advancement to resource-intensive assessment stages (e.g., structured interviews or work samples).

6.2.1 An example where use of this mechanism would be advantageous is a recruitment using a resource-intensive structured interview or work sample assessment establishes a cut score to limit advancement to candidates most likely to meet critical job requirements and manage assessment workload.

6.3 Mechanism C: Set Number of Highest-Ranked Candidates. Referral of a predetermined number of the highest-ranked eligible candidates per vacancy.

6.3.1 An example where use of this mechanism would be advantageous is when recruiting for multiple vacancies for the same position, the HR Specialist may refer a fixed number of candidates (e.g., five to seven candidates per vacancy) to provide a manageable and competitive selection pool.

6.4 Mechanism D: Set Percentage of Highest-Ranked Candidates. Referral of a predetermined percentage of the highest-ranked eligible candidates.

6.4.1 An example where use of this mechanism would be advantageous is when the recruitment has anticipated large applicant pools, a percentage-based referral (e.g., top 20–30 percent of eligible candidates) may be used to maintain a balanced and efficient referral group.

6.5 Tie Handling: When a fixed number or percentage is used to determine referrals, all candidates tied at the cutoff score must be included, even if this results in exceeding the original number or percentage established.

6.5.1 The tie rule applies when a referral mechanism establishes a fixed number or percentage of highest-ranked candidates (Mechanisms C and D). All candidates tied at the cutoff score must be included. The tie rule does not apply to cut score mechanisms (Mechanisms A and B), where all candidates meeting

or exceeding the established cut score are considered equally qualified and are referred, effectively treating the cut score as a pass/fail threshold.

6.5.2 Under Mechanism C an example of tie handling would be when a recruitment establishes referral of the top 5 highest-ranked candidates per vacancy. Candidate scores are as follows:

- 100, 98, 97, 95, 93, 93, 91

Because two candidates are tied at the cutoff score of 93, both must be referred, even though this results in 6 candidates being included instead of the originally established number of 5. When using a fixed number, all candidates tied at the line of demarcation must be included to maintain fairness and compliance with Rule of Many requirements.

6.5.3 Under Mechanism D an example of tie handling would be when a recruitment establishes referral of the top 25% of eligible candidates. If there are 40 eligible applicants, the initial cutoff identifies the top 10 candidates. Candidate scores at the cutoff are:

- 100, 99, 98, 97, 96, 95, 94, 93, 93, 93, 92

Because multiple candidates are tied at the cutoff score of 93, all tied candidates must be referred, even if this increases the referral group beyond the calculated percentage. Percentage-based mechanisms require inclusion of all tied candidates at the cutoff score to ensure consistent application of merit-based ranking.

7. Vacancy Announcement Requirements

Each JOA utilizing the Rule of Many must clearly identify the referral methodology and any applicable procedures affecting how candidates are referred. Required JOA language ensures transparency to applicants and supports consistent implementation of referral and selection processes. Servicing HR Specialists are responsible for ensuring JOA language accurately reflects the selected mechanism and aligns with approved JOA template. At a minimum, the JOA must include:

7.1 The Rule of Many mechanism that will be used to rank applicants:

7.1.1 Identification of the selected referral mechanism, specifying Mechanism A, B, C, or D under [5 CFR 332.402\(b\)](#), consistent with the mechanism documented in the case file.

7.1.2 Any pre-announcement supplement strategy, when applicable, describing how the referral group may be expanded if fewer than three eligible and available candidates per vacancy result, when available.

7.1.3 How veterans' preference will be applied.

8. Assess Applicants and Certification

This section establishes requirements for assessing applicants, issuing certificates, and administering selection actions under the Rule of Many. The servicing HR Specialists must apply these provisions consistently to ensure compliance with merit system principles, veterans' preference requirements, and delegated examining guidance.

8.1 Minimum Candidate Availability. Certificates issued under the Rule of Many should provide a sufficient number of qualified candidates for selection consideration, when available. As a general practice, this will typically support at least three candidates per vacancy; however, this is not a mandatory numerical requirement where sufficient eligible candidates are not available. Referral thresholds must remain grounded in job-related assessment results rather than administrative quotas. If a certificate yields fewer than three eligible and available candidates per vacancy, the servicing HR Specialist must follow the pre-announced supplement strategy (see definitions) identified in the JOA and case file. Any adjustment to the referral group must remain consistent with the selected referral mechanism, [GSA Order Delegated Examining Policy](#) and applicable [DEOH](#) guidance.

8.2 Veterans' Preference Rating and Ranking. Under the Rule of Many, applicants are evaluated using validated assessments that produce a numerical score. Veterans' preference is applied during the rating process by adding applicable preference points to passing scores prior to certificate issuance. Applicants are then listed on the certificate of eligibles in score order. HR Specialists are responsible for ensuring veterans' preference is properly adjudicated and accurately reflected within system-generated scores and certificate order. The following requirements apply when administering veterans' preference under a numerical ranking process:

8.2.1 Veterans' preference points (5-point or 10-point) must be added to applicants' passing scores in accordance with [OPM's Vet Guide for HR Professionals](#):

CPS	Disability rating of 30% or more	10 Points
CP	Disability rating of at least 10% but less than 30%	10 Points
XP	Disability rating less than 10%, or derived preference	10 Points
TP	Preference eligible with no disability rating	5 Points
SSP	Sole Survivorship Preference	0 Points

8.2.2 Preference eligibles must be listed ahead of non-preference eligibles with the same final score.

8.2.3 Ties in numerical scores must be resolved by applying veterans' preference, with preference eligibles placed above non-preference eligibles at the same score level.

8.2.4 Candidates with a compensable service-connected disability of 10 percent or more (CP/CPS) must be placed at the top of the certificate, except for scientific and professional positions at the GS-9 level (or equivalent) and above.

8.2.5 Veterans' preference must be applied consistently throughout rating, ranking, referral, and selection actions.

8.2.6 A non-preference eligible may be selected over a preference eligible only when one of the following conditions applies:

- The non-preference eligible is ranked higher on the certificate of eligibles based on final numerical score;
- A pass-over request has been properly adjudicated and approved in accordance with applicable regulations, including approval by OPM for 30 percent or more disabled veterans or appropriate agency-level approval for other preference eligibles; or
- The preference eligible has been removed from further consideration after meeting the requirements of the three considerations rule.

8.3 Three Considerations Rule. The three considerations rule permits removal of a candidate from further consideration after the individual has received three documented bona fide considerations for the same or similar position. Removal applies only to positions that meet the criteria for the same or similar position, defined above. This authority may be used only when selections are conducted under Rule of Many procedures and may not be applied to category rating actions.

8.3.1 Eligibility for Removal. A candidate may be removed from further consideration when all of the following conditions are met:

- The candidate was referred and received three bona fide considerations for the same or similar positions, as defined above. A bona fide consideration requires documented review of the candidate's application tied to an actual vacancy announcement, certificate issuance, and selection decision;
- A valid selection occurred during each instance of non-selection;
- The hiring official submits written documentation identifying job-related skills or attributes the candidate lacks; and
- Servicing TAC Branch Chief approval is obtained (see [Appendix B](#) for sample MFR and [Appendix C](#) for the removal request process).

8.3.2 Starting with the fourth selection, the agency may remove one or more candidates under this rule, up to the number of selections remaining on that certificate. Considerations from prior certificates may be counted only when the

positions meet this Order's definition of same or similar position and the applicant received the bona fide consideration within the last 120 days of the removal request (see [Appendix B](#) for sample MFR and [Appendix C](#) for the removal request process). When certificates are issued by separate locations, simultaneous listing may result in concurrent bona fide considerations across multiple certificates. Each certificate remains a separate referral action and must be documented independently.

8.3.3 Documentation Requirements for Removals. The hiring official is responsible for providing sufficient documentation to demonstrate prior bona fide considerations. HR Specialists validate submitted information but are not responsible for researching or compiling an applicant's historical consideration record on behalf of the hiring office. Approved removal requests must be documented using the Memorandum for Record (MFR) format provided in [Appendix B](#) and retained in the case file. See [Appendix C](#) for the standardized removal request process. The MFR must include, at a minimum:

- A signed hiring official statement identifying the specific skills or attributes determined insufficient;
- Documentation of the vacancy announcements, certificates, and dates associated with the three bona fide considerations; and
- Servicing Branch Chief Approval.

8.3.4 Example of three considerations with multiple vacancies: A hiring office is recruiting for six (6) vacancies under Announcement GS-1102-13 using Rule of Many procedures. During the fourth selection from the certificate, the hiring official requests removal of a candidate under the three considerations rule based on the candidate having received three bona fide considerations during the current recruitment.

The hiring official documents that the candidate was considered during three separate selection decisions from the same certificate issued for this announcement. The request includes a written statement identifying the specific job-related skills or attributes determined insufficient and identifies the selections in which the candidate was reviewed but not selected.

Three consideration determinations are limited to documented considerations made by the hiring official for the position being recruited. Hiring officials must provide sufficient documentation demonstrating when the candidate was considered for the specific announcement.

8.3.5 Example of three considerations when additional positions are approved for recruitment: A hiring office announces a GS-1102-13 recruitment under Rule of Many with two (2) initial vacancies. The hiring official makes two selections from the certificate and considers Candidate A during each selection but does not

select the candidate.

Thirty (30) days later, the hiring office receives approval to fill three (3) additional vacancies for the same position. The certificate remains active and within the 120-calendar-day validity period. The hiring official continues making selections from the same certificate.

During the next selection decision, Candidate A is reviewed again and not selected. Because the candidate has now received three bona fide considerations, the hiring official may request removal under the three considerations rule beginning with the fourth selection.

To support the request, the hiring official documents:

- That Candidate A was considered during Selection 1 and Selection 2 (initial vacancies), and again during Selection 3 after the additional vacancies were approved;
- The dates of each selection decision; and
- A written statement identifying the job-related skills or attributes determined insufficient.

8.3.6 Example of three considerations when recruiting for different positions that are similar: A hiring official conducted two separate Rule of Many recruitments for GS-0343-13 Management Analyst positions within the same organization. The first recruitment filled two (2) vacancies for a position focused on recruitment and workforce planning, and the second recruitment filled three (3) vacancies for a position focused on training and program development.

Although the functional emphasis of the positions differed, both recruitments required similar analytical competencies, stakeholder engagement, and program evaluation skills within the same occupational series and grade level. The hiring official participated in the selection decisions for both recruitments and the candidate they wished to be removed was referred and considered on both.

When requesting removal under the three considerations rule, the hiring official documents that the candidate received three bona fide considerations by identifying:

- the two recruitment announcements and associated certificates;
- the specific selection decisions in which the candidate was reviewed; and
- a brief explanation describing how the positions were similar (e.g., both GS-0343-13 roles required policy analysis, program assessment, and advisory responsibilities despite differing functional focus areas).

The hiring official's explanation establishes the basis for determining that the positions are similar and documents when the considerations have occurred.

8.4 Order of Selection. Hiring officials may select any eligible candidate listed on the certificate in accordance with veterans' preference provisions and applicable regulatory requirements.

8.4.1 Hiring officials may not select a non-preference eligible candidate over a preference eligible candidate who has the same or lower standing on the certificate unless required pass-over procedures are followed. All objection and pass-over requests must be processed in accordance with [GSA Order for Veteran Pass Over and Objection Requirements and Procedures](#) and applicable regulations.

8.5 Simultaneous Listing. Candidates will be listed simultaneously on all certificates for which they are interested, eligible, and within reach. Simultaneous listing supports fair and consistent consideration across recruitment actions. Simultaneous listing may be limited only when necessary for good administration and when applicants have been appropriately notified. Any administrative determination to limit simultaneous listing must be justified and documented in the case file.

8.6 Shared Certificates. The use and sequencing of shared certificates must comply with applicable regulations, agency policy, and the [DEOH](#). GSA cannot use considerations taken by another agency when applying internal procedures, including removal under the three considerations rule. All decisions affecting candidates on shared certificates must be supported by GSA-specific documentation and approvals.

9. Documentation and Recordkeeping

To ensure transparency, consistency, and regulatory compliance, servicing HR staff must maintain complete and accurate documentation supporting the selection and application of Rule of Many referral mechanisms. Documentation requirements outlined in this section establish the minimum recordkeeping standards necessary to support reconstruction of examining actions, third-party review, and oversight activities.

For each announcement, the servicing HR Specialist must document and retain in the case file the selected referral mechanism under [5 CFR 332.402\(b\)](#), including the rationale, supporting analysis, and how the recruitment action complies with Rule of Many requirements and the three considerations rule under [5 CFR 332.405](#). Documentation must demonstrate alignment with regulatory guidance, system capabilities, and agency implementation timelines.

9.1 Minimum Documentation Requirements. Beyond the standard required case file documentation for recruitment when using Rule of Many the case file must include:

9.1.1 Mechanism decision justification, this can be documented on the Job Analysis as well as the Strategic Recruitment Checklist. Documentation should include the selected referral mechanism (A, B, C, or D). Supplemental documentation may include:

- Rule of Many compliance documentation, including calculations or rationale demonstrating how the selected mechanism is expected to produce a sufficient number of eligible and available candidates for consideration, when available;
- target referral group size or percentage;
- supplement strategy if fewer than three candidates per vacancy result, when available; and
- any supporting rationale such as labor market data, historical applicant volume, assessment design, business necessity considerations, or job analysis documentation supporting cut scores.

9.1.2 Certificate documentation including the certificate, tie-handling determinations, and verification that minimum candidate sufficiency requirements were considered.

9.1.3 Three considerations rule documentation, as applicable, including hiring manager requests, supporting rationale, all removal requests both approved and disapproved, and any candidate notification records.

9.1.4 Pass-over packages, when applicable, prepared and processed in accordance with veterans' preference requirements and [GSA Order for Veteran Pass Over and Objection Requirements and Procedures](#).

10. Metrics and Oversight

To support consistent implementation, accountability, and continuous improvement of Rule of Many procedures, OHRM will monitor key performance and compliance indicators. Metrics may be used to inform training priorities, policy updates, and quality assurance reviews. OHRM leadership may establish additional monitoring measures as necessary to ensure compliance with applicable laws, regulations, and agency guidance. At a minimum, the following areas will be monitored:

10.1 Percentage of certificates that provide a sufficient number of eligible and available candidates for consideration, when available, typically supporting at least three candidates per vacancy.

10.2 Timeliness of certificate issuance following announcement close, including identification of trends affecting hiring efficiency.

10.3 Use of each Rule of Many referral mechanism relative to vacancy count, applicant volume, and recruitment outcomes.

10.4 Monitoring of pass-over actions, objection processing, and adherence to applicable timelines and documentation requirements.

10.5 Frequency of use, documentation sufficiency, and consistency of approval actions related to the three considerations rule.

Appendix A — Rule of Many: Information for Hiring Officials

What is the Rule of Many?

Rule of Many is a numerical ranking process used in federal hiring. Applicants receive a score based on job-related assessments, and veterans' preference points are added when applicable. Candidates are then listed on the certificate in score order.

Hiring officials may select from a larger group of highly ranked candidates instead of being limited to only three candidates.

Rule of Many may be used for:

- Delegated Examining recruitments
 - Certain excepted service hiring actions, e.g., Pathways Interns and Recent Graduates
-

What is the Rule of Many Designed to Do?

Rule of Many replaces the former Rule of Three and is intended to:

- Expand flexibility in hiring decisions
 - Improve fairness and efficiency in recruitment
 - Support merit-based selection using validated assessments
 - Allow managers to consider a broader pool of top talent
-

Is the Rule of Many the Same as Category Rating?

No. Both methods use assessments, but they rank candidates differently.

Rule of Many	Category Rating
Uses numerical scores	Uses quality categories
Candidates ranked in score order	Candidates grouped into categories
Veterans' preference added as points	Preference applied within categories

How Veterans' Preference Works Under Rule of Many

- Veterans' preference points are added to applicants' scores during rating.
- Preference eligibles appear ahead of non-preference candidates with the same score.
- CP/CPS candidates are placed at the top of the certificate (with exceptions for professional and scientific series at GS-9 and above).

A non-preference eligible may be selected over a preference eligible only when:

1. The non-preference eligible is ranked higher, or
2. An approved pass-over has occurred, or
3. The preference eligible has been removed from further consideration under the Three Considerations Rule.

What is the Three Considerations Rule?

The Three Considerations Rule allows an agency to discontinue consideration of a candidate after they have received three bona fide considerations for the same or similar position and were not selected. Applies only to Rule of Many recruitments and cannot be used under Category Rating procedures.

When Can a Candidate Be Removed from Consideration?

A candidate may be removed when:

- They were referred and considered three times for the same title, series, and grade;
- A valid selection(s) occurred each time; and
- You provide a written statement identifying job-related skills or attributes the candidate lacks.

Removal decisions follow the approval chain:

Hiring Official → Servicing HR Specialist → Servicing HR Branch Chief (final approval)

What is a Bona Fide Consideration?

A bona fide consideration means:

- You reviewed the candidate's application for an actual vacancy,
 - The consideration was tied to a real certificate and hiring action, and
 - A documented selection process occurred.
-

Timing of Considerations

Comparable considerations may only be counted while the certificate is open and may not exceed **120 calendar days**.

What Happens After a Removal Due to Three Considerations is Approved?

- Starting with the fourth selection, a candidate may be removed from further consideration for that vacancy.
- Candidates remain on the certificate but may be annotated as considered three times no further consideration.

Other hiring managers may still choose to consider the candidate.

Pass-Over vs. Removal — What's the Difference?

If a preference eligible has already been removed under the Three Considerations Rule, a pass-over is not required.

Pass-Over	Three Considerations Removal
Applies only to preference eligibles (veterans)	Applies to any candidate
Requires formal approval to select lower-ranked non-veteran	Removes candidate from further consideration after repeated non-selection

Based on qualifications determination	Based on repeated bona fide considerations
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What Hiring Officials Are Responsible For

Hiring officials play a key role in ensuring fair and compliant hiring. You are responsible for:

- Reviewing referred candidates and providing bona fide consideration
 - Documenting job-related reasons when recommending removal under the Three Considerations Rule
 - Following veterans' preference and selection requirements
 - Coordinating with your HR Specialist during the recruitment process
-

Resources:

- [Rule of Many Federal Hiring FAQ](#)
- [Rule of Many and Skills Based Hiring](#)
- [Rule of Many and Three Considerations](#)
- [Rule of Many and Veterans' Preference](#)
- [Rule of Many Compared to Category Rating](#)

Appendix B — Sample Memorandum for Record (MFR) Three Considerations Rule Removal Request

(DATE)

MEMORANDUM FOR: (Servicing Branch Chief, Name)
FROM: (Hiring Official)
(Title)
(Office)

SUBJECT: Request for Removal from Further Consideration Under the Three Considerations Rule

Position Information

- Announcement Number: _____
- Position Title/Series/Grade: _____
- Duty Location: _____
- Hiring Authority: _____
- Certificate Number: _____
- Certificate Date: _____

Candidate Information

- Candidate Name: _____
- Preference Status (if applicable): _____
- Final Numerical Score: _____

Job-Related Rationale for Removal

(Insert summary here identifying the specific job-related skills, competencies, or attributes that were determined insufficient based on bona fide consideration of the candidate's application materials. Statements must be tied to the position requirements and may not reference non-merit factors.)

Summary of Bona Fide Considerations

The candidate listed above received three bona fide considerations during the current recruitment for the positions identified below. Each consideration reflects review of the candidate's application tied to an actual selection decision from this certificate.

Comparable considerations occurred while the certificate was open and within the 120-day consideration period.

Considerations	Certificate #	PAR #	Date of Consideration	Selection Outcome
1				
2				
3				

I certify that:

- I reviewed the candidate's application during three separate selection decisions;
- Each consideration was tied to a current certificate and an actual selection action; and
- The information provided above accurately reflects my hiring decisions.

I request removal of this candidate from further consideration under the Three Considerations Rule.

Hiring Official Name/Signature: _____

Date: _____

Branch Chief Approval

- Approved
- Disapproved

Comments (if applicable):

Branch Chief Name/Signature: _____

Date: _____

This MFR must be retained in the case file along with:

- Hiring official rationale
- Evidence of bona fide considerations
- Any associated approval or related correspondence

Appendix C — Three Considerations Rule Removal Request Process

This appendix outlines the standardized process for submitting, reviewing, and approving removal requests under the three considerations rule. The process ensures consistent documentation, appropriate review, and proper maintenance of case files.

<p>Step 1 — Hiring Official Initiates Request</p>	<p>The hiring official prepares a Memorandum for Record (MFR) using the Appendix B template to request removal under the three considerations rule. The MFR must document:</p> <ul style="list-style-type: none"> ● The three bona fide considerations tied to the current recruitment or similar position(s); ● The selection decisions associated with each consideration; and ● The specific job-related skills or attributes determined insufficient. <p>The hiring official submits the completed MFR to the servicing HR Specialist.</p>
<p>Step 2 — HR Specialist Review and Routing</p>	<p>The servicing HR Specialist reviews the MFR for completeness and alignment with policy requirements. The HR Specialist:</p> <ul style="list-style-type: none"> ● Validates that required documentation is included; ● Ensures the request aligns with Rule of Many procedures; <ul style="list-style-type: none"> ○ If the HR Specialist concurs, the MFR is forwarded to the Servicing Branch Chief for final determination. ○ If the HR Specialist does not concur, the request is returned to the Hiring Official with an explanation of why it does not meet policy or documentation requirements. <p>The HR Specialist validates submitted documentation but does not research or compile applicant consideration history on behalf of the hiring official.</p>
<p>Step 3 — Servicing Branch Chief</p>	<p>The Servicing Branch Chief reviews the MFR and supporting documentation and issues a final decision:</p> <ul style="list-style-type: none"> ● Approved — The removal request is authorized; or ● Disapproved — The candidate remains under

	<p>consideration consistent with certificate procedures.</p> <p>The Branch Chief documents the determination within the MFR and notifies the HR Specialist of the decision.</p>
<p>Step 4 — HR Specialist Notification and Certificate Action</p>	<p>Upon receipt of the Branch Chief’s decision, the servicing HR Specialist:</p> <ul style="list-style-type: none"> ● Notifies the hiring official of the determination; ● Annotates the certificate as appropriate (e.g., “Considered three times — no further consideration”), when removal is approved.
<p>Step 5 — Case File Retention</p>	<p>All MFRs associated with three considerations rule requests must be retained in the case file, regardless of approval or disapproval, in accordance with delegated examining documentation requirements and agency records management policy.</p>