June 6, 2025

Mr. Noah Peters
Senior Advisor to the Director
Office of Personnel Management (OPM)
1900 E St NW
Washington, DC 20415

Submitted electronically via email

RE: Response to Improving Performance, Accountability and Responsiveness in the Civil Service

Dear Mr. Peters,

On behalf of 20 scientific societies, we submit this response to the Office of Personnel Management's (OPM) proposed rule "**Improving Performance, Accountability and Responsiveness in the Civil Service," Docket ID: OPM-2025-0004, RIN 3206-AO80.** Thank you for the opportunity to provide input, clarifications, and recommendations to improve federal workforce hiring and retention on this proposed rulemaking.

The proposed rule supposes that, because it is difficult for agency leadership to fire them, "career federal employees use their positions to advance their personal political or policy preferences instead of implementing the elected President's agenda" which "undermin[es] democracy, as it enables government power to be wielded without accountability to the voters or their elected representatives." On this basis, the proposed rule puts forward to be able to "expeditiously remove career employees in policy-influencing positions for poor performance or misconduct, such as corruption or for injecting partisanship into the performance of their official duties."

As organizations representing more than 230,000 scientists and professionals working across biomedical, agricultural, environmental, ecological, and other scientific disciplines, we strongly urge OPM to reconsider this rule. Concerns and recommendations are outlined below.

Career Civil Servants Uphold Science-Based Policy

Assertion: Career civil servants, including scientists, are essential to democratic governance and the integrity of public policy. Their protected role within a merit-based, non-partisan civil service—established under the *Pendleton Civil Service Reform Act of 1883*—is fundamental to ensuring that government decisions are guided by evidence, professional expertise, and the public interest.

- ***Recommendation:*** Language from OPM suggesting that civil servants who raise concerns about political directives are undermining democracy or advancing personal views should be eliminated.

- ***Justification:*** Civil servants, including career scientists, play a crucial role in upholding science-based, evidence-driven policy that serves the American public. These professionals are bound by law, ethical codes, and institutional norms that emphasize data integrity, analytical rigor, and procedural fairness. Their responsibility to question political directives—when such directives conflict with evidence or the public interest—is a vital safeguard that ensures government decisions are not based solely on short-term political expediency.

This principle has deep roots in American governance. The *Pendleton Civil Service Reform Act of 1883* was enacted precisely to insulate federal employees from political pressure and to professionalize the civil service. It created a merit-based system that protects career officials from being hired or dismissed based on political loyalty, ensuring that federal workers are selected for their qualifications and expertise—not their connections. This foundation remains essential today, particularly in scientific and technical roles that demand independence and objectivity.

When civil servants, especially scientists, are empowered to speak candidly and act according to evidence, they help ensure that executive actions are grounded in facts and subject to rigorous scrutiny. This dynamic reinforces democracy by ensuring that policy outcomes are informed by expertise that transcends electoral cycles and political turnover. The enduring strength of American public policy in areas like national security, public health, environmental protection, and economic resilience is due in no small part to a professional, non-partisan bureaucracy capable of raising questions about untested or politically motivated directives when they threaten long-term public welfare. The accountability of civil servants to both scientific integrity and democratic principles is a core institutional strength—one that promotes public trust, operational competence, and fairness in governance.

Functional Clarification: Scientists and Research Administrators are Not Policymakers

Assertion: Government scientists and those who oversee or support the scientific research enterprise are not policymakers. Their responsibilities, whether conducting research, managing peer review, or administering grant programs—are rooted in scientific and technical expertise, not in the formulation or advocacy of public policy. Mischaracterizing these roles as "policy-influencing" conflates scientific judgment with political decision-making and threatens the integrity and apolitical nature of the federal scientific workforce.

- ***Recommendation***: If this proposed rule moves forward, OPM should clearly define the category of "policy-influencing positions" to explicitly exclude federal scientists and employees who conduct, oversee, or support scientific research programs, including those who review or recommend grant recipients. Without such clarification, the rule risks undermining the scientific merit review system and the non-partisan foundation of federal research funding.

- ***Justification****:* Federal research agencies—including but not limited to the National Science Foundation (NSF), National Institutes of Health (NIH), Department of Energy (DOE), Department of Defense (DoD), National Oceanic and Atmospheric Administration (NOAA), and U.S. Department of Agriculture (USDA)—depend on career professionals with deep scientific expertise to manage and oversee the merit-based peer review of research proposals. These professionals do not set or establish public policy. Instead, they implement statutory missions by facilitating competitive, evidence-based processes that ensure taxpayer-funded research supports the best ideas and most capable investigators.

  Misclassifying these technical roles as "policy-influencing" would create several significant risks to the innovation ecosystem and federal scientific objectives:

A. Risk of Undermining Scientific Integrity: Misclassifying these technical roles as "policy-influencing" introduces several risks that undermine both scientific integrity and the effectiveness of federal efforts. This classification conflates technical expertise with policy advocacy, increasing the likelihood of inaccurate role assessments, which may lead to misaligned oversight, misinformed staffing decisions, and reduced trust in the objectivity of scientific input. It risks distorting the purpose of these roles, which is to provide evidence-based analysis—not to advocate for specific policy outcomes—ultimately compromising the quality and reliability of scientific contributions to federal decision-making.

B. Undermining Merit-Based Review**:** The peer review system is a cornerstone of U.S. scientific excellence and global competitiveness. Federal employees who facilitate or oversee this process exercise professional discretion, not political authority. Re-casting their roles as policymaking could chill participation, distort hiring and promotion practices, and discourage qualified experts from entering or remaining in public service.

C. Disruption to Operations**:** Research agencies rely on skilled professionals to draft funding opportunity announcements, coordinate external review panels, evaluate scientific merit, and recommend proposals for funding. These duties, while involving expert judgment, are technical and procedural—not policy-setting. Mis-labeling these functions could trigger administrative burdens, require unnecessary political vetting, and delay or disrupt time-sensitive funding cycles.

D. Misalignment with Statutory Intent**:** Congress has long supported the use of merit-based review as a neutral, evidence-driven mechanism to allocate research funds in accordance with national interests. Scientists and administrators carry out this work to serve the public good—not to shape public policy. Conflating administrative discretion with policy authority risks undermining the very laws that created these institutions and those that have been established to protect them.

Eroding Efficiency: The Impact of Workforce Reclassification on Government Function

Assertion: Reclassifying civil servants—including government scientists or those who oversee research administration-- to strip them of existing civil service protections is an inefficient and destabilizing approach to governance. Such changes would politicize essential roles, disrupt continuity, and undermine the effectiveness, morale, and public trust necessary for the smooth and impartial operation of federal agencies.

- ***Recommendation:*** The proposed rule should be withdrawn or significantly revised to preserve civil service protections for career professionals, not remove them. Federal employees performing technical, scientific, administrative, or oversight functions should remain under the merit-based civil service system, which ensures hiring and retention based on qualifications. Mechanisms already exist within the current system to address performance and misconduct.

- ***Justification:*** The existing civil service system was designed to ensure that government employees are selected and retained based on merit, competence, and non-partisanship—principles formalized under the *Pendleton Civil Service Reform Act of 1883*. This system has proven to be an effective and efficient foundation for a professional federal workforce that

can operate reliably across administrations. Re-classifying career civil servants into positions that lack these protections would make critical public servants—scientists, program officers, analysts, grant reviewers, and policy implementers—vulnerable to dismissal or replacement with each new administration. Rather than enhancing accountability or agility, such a shift would inject instability into agency operations, erode institutional memory, and increase turnover in roles that require specialized expertise and continuity. The highly successful U.S. innovation system which has led to economic prosperity for decades has been rooted in a partnership between the federal government and the scientific community. The operationalization of that partnership is inextricably tied to the technical expertise of the civil servants who oversee support of scientific research. In short, removing civil service protections would not make the government more efficient or accountable. Instead, it would lead to less continuity, reduced expertise, and a less capable and less efficient public workforce to the detriment of all Americans.

Recommendations to Improve Federal Workforce Hiring and Retention

While we oppose proposals to erode civil service protections as proposed by OPM under this rule, we recognize the need for modernization in federal hiring and workforce management. Building and maintaining a high-performing federal scientific workforce requires a positive, mission-driven environment that values expertise, supports professional growth, and aligns incentives with public service impact—rather than a fear of dismissal. Below are several evidence-based recommendations for how the federal government can improve hiring, retention, and performance among career scientists and research administrators:

1. Streamline and Modernize Hiring for Scientific Positions - The current hiring process is often too slow and inflexible to attract top scientific talent. We recommend expanding the use of direct hire authority and developing science-specific hiring pipelines for critical areas such as data science, biosecurity, and environmental resilience.

2. Improve Access for Early-Career Scientists - Create clearer and more accessible pathways into the government service for recent graduates and postdoctoral researchers, including better integration of fellowship programs and easier transitions into permanent roles.

3. Update Occupational Classifications for Modern STEM Fields - Existing federal job classifications do not align with interdisciplinary fields such as entomology, computational biology, informatics, or bioengineering. We urge OPM to revise or expand scientific job series to reflect current and emerging disciplines and the trending evolution of science towards more interdisciplinary work.

4. Enhance Professional Development and Retention Efforts - Support the long-term success of federal scientists by offering ongoing training, opportunities for collaboration and publication, and transparent promotion pathways aligned with scientific contributions. This includes an expanded use of tiered roles and promotion ladders that enable individuals to advance based on expertise and leadership, supports the development of scientists into new technical roles as programs sunset new ones arise, and that provide an avenue for managers to reward those who work hard and demonstrate increasing level of responsibility and leadership. Those who do not perform do not qualify for promotion and will have a greater rate of attrition.

5. Strengthen Mission-Driven Culture- Build a culture of trust, autonomy, and purpose. This can be done by encouraging open dialogue on program effectiveness, efficiency, and policy impact and supporting innovation/creativity.

Thank you again for the opportunity to share our recommendations regarding ways to improve performance, accountability, and responsiveness in the civil service, and for your consideration of our feedback.

Sincerely,

American Geophysical Union
American Institute of Biological Sciences
American Mathematical Society
American Ornithological Society
American Physical Society
American Phytopathological Society
American Society for Microbiology
American Society of Human Genetics
American Society of Naturalists
Association for Women in Science
Association of Ecosystem Research Centers
Ecological Society of America
Entomological Society of America
Natural Science Collections Alliance
Organization of Biological Field Stations
Society for Freshwater Science
The Society for Industrial and Organizational Psychology (SIOP)
Society for the Study of Amphibians and Reptiles
Society of Environmental Toxicology and Chemistry of North America
Society of Nematologists