



CONSORTIUM of SOCIAL SCIENCE ASSOCIATIONS

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June 6, 2025

United States Office of Personnel Management
1900 E Street NW
Washington, DC 20415

Re: Public Comment on Proposed Rule on Improving Performance, Accountability, and Responsiveness in the Civil Service (OPM-2025-0004), RIN (3206-AO80).

To Whom It May Concern:

On behalf of the Consortium of Social Science Associations (COSSA), thank you for the opportunity to submit comments in response to the proposed rule issued by the Office of Personnel Management on *Improving Performance, Accountability, and Responsiveness in the Civil Service* ([OPM-2024-0004](#)).

COSSA is a nonprofit organization working to promote and advance the social and behavioral sciences in federal policymaking. We serve as a united voice for organizations, institutions, communities, and stakeholders who care about a successful and vibrant social science research enterprise. The COSSA membership ([list](#)) includes professional associations, scientific societies, research centers and institutes, colleges and universities, and industry affiliates.

Over the course of COSSA's 44-year history we have had the privilege of working with federal agency officials at all levels, including political appointees and career civil servants who all share a passion for serving the American people. Within the federal scientific enterprise, federal agencies like the National Science Foundation (NSF), National Institutes of Health (NIH), Institute of Education Sciences (IES), National Institute of Justice (NIJ), and federal statistical agencies, have benefited from the expertise of civil servants who bring rich scientific and technical backgrounds to government service. Countless science professionals choose federal service over careers in academia or industry so they may apply their skills in ways that benefit the greatest number of people. In our experience, career civil servants are deeply committed to the work of government in improving Americans' lives, are dedicated to their department or agency's mission, and are driven to do what is best to advance science for the betterment of society.

Therefore, COSSA raises the following points in response to the proposed rule:

1. Maintaining institutional knowledge and attracting a range of perspectives into federal service is in our national interest.

The proposed rule would reclassify current "policy-influencing" career positions to "Schedule Policy/Career" and remove certain employee protections making it easier to dismiss them from

government service. Such a move would significantly hinder the federal government's ability to retain top talent to work on serving the American people. As noted, career civil servants, especially those working in federal science agencies, bring unique skills and viewpoints to their jobs. Providing career civil servants with certain protections, that can prevent them from termination based on political or partisan perceptions of job performance, can help to nurture objectivity and loyalty in the federal workforce. Maintaining levels of independence for career civil servants working at science agencies can allow their work to be informed by the best available science. Attracting excellent talent into federal service is already a significant challenge; the proposed rule would further narrow the pipeline of scientists considering careers in government service, to the detriment of the American people.

2. Scientific research supported by taxpayer dollars should remain insulated from partisan influence.

The career civil service is the backbone of America's gold-standard scientific enterprise, which is the envy of the world. The President of the United States has the authority and, frankly, the duty to set priorities and objectives that guide the work of their Administration, including priorities for federal science agencies. However, to best serve the interests of the American people, the President *should not*, intentionally or unintentionally, predetermine scientific evidence to advance a policy outcome. Federal science agencies should be expected to utilize the expertise of their technical workforce, the rigor of the peer review process, and sound stewardship of taxpayer dollars to explore how science can inform evidence-based policymaking. The proposed rule risks adding a layer of politicization to the federal research grantmaking process. The efforts of NSF, NIH, and other science agencies should be *informed* by Administration priorities but given the independence needed to produce unbiased, objective scientific findings.

3. Added protections are essential to ensure trust in government science and data.

Should the proposed rule take effect, we urge that it explicitly exempt career scientific and statistical positions across the government, especially research program officers and those working at [principal statistical agencies](#). The American Statistical Association, which is a COSSA member organization, discussed the reasons for such an exemption in their excellent [comments](#). As they note,

"While federal statistics indisputably inform policy decisions, the statutory mandates, organizational design, and governing directives of these agencies explicitly require statistical agencies—and by extension their employees—to remain strictly non-partisan, objective, and policy neutral. Their role is deliberately structured to stop short of policy influence."

Maintaining public trust in government data and statistics requires strict attention to integrity and objectivity. Therefore, we endorse the ASA's recommendation that officials working in federal statistical agencies and the Chief Statistician of the U.S. be exempted from the new classification.

Thank you for the opportunity to express these views. Please do not hesitate to contact me with any questions or if you would like to discuss further. I can be reached at wnaus@coffa.org.

Sincerely,



Wendy A. Naus
Executive Director