

PPC Action Alert

Submit Public Comments on Proposed Rule Seeking to Remove Civil Service Protections from Federal Science Agency Staff

On April 23, the Office of Personnel Management (OPM) [published a notice of proposed rulemaking](#) that seeks to reclassify broad swaths of federal government employees as “confidential, policy-determining, policy-making, or policy-advocating” positions, a designation known as “Schedule Policy/Career.” The proposed change would remove civil service protections for employees long considered nonpartisan career civil servants and allow them to be more easily removed by the sitting President.

This proposed regulation threatens to undermine the science-based and expert-driven process for funding and conducting research at federal agencies. Currently, only the National Institutes of Health (NIH) director and the director of the National Cancer Institute are appointed by the president, while the rest of the agency’s nearly 20,000 staff, including other Institute and Center directors, are considered career civil servants who have broad protection from political coercion. The NIH’s ability to support scientific research based on impartial evaluation free from political influence has been essential to advancing discoveries that have led to ground-breaking cures and therapies that have enhanced the lives of millions of people around the world.

If finalized, this rule could result in the reclassification of all NIH Institute and Center directors as political appointees, injecting political considerations into the NIH’s processes. Additionally, the proposed regulation identifies grant-making responsibilities as a type of policymaking and suggests that employees who have discretionary control over the distribution of federal funding be reclassified to policy-making positions under Schedule Policy/Career. Such a policy change could bring program officers and others with discretionary grant-making authority at the NIH under the control of the incumbent administration, with concerning implications for the scientific integrity of the federal government’s research grant-making process.

Here's how you can help. [The public comment period for this rule is open until June 7, 2025.](#) **Please consider drafting a public comment highlighting how the proposed rule would undermine scientific expertise across the federal government.**

Submit Public Comments in the Federal Register

Here’s how:

1. Go to the Docket for the “Improving Performance, Accountability and Responsiveness in the Civil Service” (OPM-2025-0004) proposed rule on [Regulations.gov](https://www.regulations.gov). It will indicate that the comment period ends on June 7 at 11:59 PM EDT.
2. Select the blue “Comment” icon underneath the rule’s title in the top lefthand corner of the webpage.
3. Draft a public comment using the discussion guidance below.
4. Submit your comments using the form.

Discussion guidance

Consider using the points below to inform your public comments. *You do not need to provide your name, email address, or any other identifying information if you do not wish to do so. You may instead submit anonymously, where the option to enter your email address for submission information will not be available. You will not be asked to provide an affiliation.*

- A professionalized civil service characterized by experience and expertise is a foundational element of the National Institutes of Health (NIH) and other federal scientific agencies that has enabled the U.S. to be a world leader in biomedical research. Preserving civil service protections is critical to ensuring the U.S. remains a world leader in driving the next generation of cures for patients.
- Science requires open inquiry, the ability to develop and test new hypotheses, and the freedom to challenge convention. Civil service protections create the space to support scientific endeavors without fear of arbitrary or politically motivated disciplinary actions. By contrast, federal scientists who fear dismissal for political reasons are less likely to offer candid analyses or pursue cutting-edge research.
- NIH and other federal scientific agencies depend on their ability to recruit top talent to drive high-quality science. The removal of civil service protections may make it more difficult to attract and retain highly trained scientists and others with technical expertise based on concerns that they will not be given the independence needed to pursue their research. These individuals may instead seek employment in the private sector, limiting the federal government’s scientific capacity.
- The politicization of science is a fundamental threat to American scientific leadership and public health. It would subject vital research initiatives and public health programs to political scrutiny rather than consistent, expert-driven recommendations.
- We urge you to reject this proposed rule and protect the integrity of research.