

May 21, 2025

Office of Personnel Management
1900 E Street, N.W.
Washington, DC 20415

Submitted via www.regulations.gov

Re: Public Comment in Response to “Improving Performance, Accountability and Responsiveness in the Civil Service” [Proposed Rule, 90 Fed. Reg. 17182, Docket ID: OPM-2025-0004]

Dear Office of Personnel Management:

On behalf of the American Association for Dental, Oral, and Craniofacial Research (AADOOCR), the leading professional community for multidisciplinary scientists who advance dental, oral, and craniofacial research, we appreciate the opportunity to comment on the Office of Personnel Management’s (OPM) Proposed Rule “Improving Performance, Accountability and Responsiveness in the Civil Service”. **We write to express opposition to the proposed rule.**

The proposed rule would expand the use of Schedule F, reclassifying many federal civil servants as “policy-influencing positions” subject to presidential appointment and removal. This action would politicize the federal workforce and poses a serious threat to the integrity, continuity, and effectiveness of federally funded scientific research and public health policy. It also violates federal law requiring that civil servants be hired based on merit, not political loyalty.

The United States’ continued leadership in biomedical research and science depends on the expertise of directors and program officers who oversee the merit-based peer review of competitive research proposals. The National Institutes of Health (NIH) relies on these professionals—selected for their scientific credentials and research experience—to uphold the integrity of the funding process. Their responsibilities include evaluating proposals, assembling expert review panels, soliciting peer reviews, and preventing any conflicts of interest. Their role is critical to ensure that federal research investments are subject to a fair, rigorous, and merit-based review. Reclassifying NIH staff would compromise the objectivity of funding decisions and, ultimately, the quality and impact of the research supported by federal funds.

This rule would also lead to more turnover in important scientific agency roles, making it harder to plan and carry out long-term research. Many federal research projects last for years requiring the steady leadership and oversight of experienced staff with long-term institutional memory. Constant staff changes would disrupt this continuity, slow scientific progress, and create confusion for researchers and institutions that rely on federal support.

Further, if NIH and other research agencies are staffed with individuals chosen for their political loyalty rather than their scientific qualifications, it will undermine their perceived independence, eroding public trust in these agencies, their scientific findings and the data they produce.

Scientific progress depends on the ability of federal research agencies and their staff to operate free from political interference. The proposed rule threatens the independence and stability of these agencies and will hinder their ability to advance critical scientific research.

On behalf of the dental, oral, and craniofacial research community, we urge OPM to rescind this proposed rule and instead strengthen nonpartisan merit-based employment at our federal agencies.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Chris H. Fox".

Christopher H. Fox, DMD, DMSc
Chief Executive Officer