

June 6, 2025

Office of Personnel Management
1900 E St. NW
Washington D.C., 20415

RE: Docket No. OPM-2025-0004, “Improving Performance, Accountability and Responsiveness in the Civil Service

The American Society for Biochemistry and Molecular Biology (ASBMB) is a nonprofit professional society that builds and empowers a broad community of molecular life scientists advancing discovery. Its community comprises 11,000 members, including researchers and science educators, ranging from senior scientists to students. ASBMB advocates for strengthening the science, technology, engineering and mathematics (STEM) workforce, and supports robust, sustained funding for the U.S. research enterprise.

ASBMB appreciates the opportunity to provide feedback on the [proposed rule](#) to “improve performance, accountability and responsiveness in the civil service.” The proposed rule would allow positions that influence broad areas of scientific funding deliberation to be moved into Schedule F or Schedule Policy/Career positions, and we strongly oppose this proposed policy. This policy would remove civil service protections for key federal staff who drive evidence-based scientific funding decisions and make them at-will employees. Lack of employment protections would have a major influence on scientific funding decisions, seriously undermining U.S. global scientific leadership, global competitiveness and hurt the overall health and well-being of the American people.

America’s key science agencies must have the ability to recruit, retain and train a highly skilled scientific workforce that enables groundbreaking innovation across the country. This proposal would weaken scientific integrity and federal agencies’ ability to attract scientific talent by greatly increasing the introduction of political views into the scientific method and long-established, highly effective processes at scientific agencies to guide research. Current civil service positions at risk include scientific institute directors, program officers, scientific review officers, and others. These individuals should not be subject to hiring based on political perspective but should be hired for their knowledge, skills and abilities in scientific achievement and expertise. That hiring process—which is the current process with civil service protections—enables them to approach their decisions based on non-ideological considerations such as scientific excellence and potential; analysis of the burden of disease for overall populations and relevant subpopulations; and national security and U.S. economic impacts.

Removing civil service protections for these key roles would open these positions to biased decision making and political influence in science funding decisions, leave scientific staff vulnerable to political pressure, and undermine evidence-based scientific decision-making.

ASBMB opposes this proposed rule and believes that U.S. civil service practices should reinforce the role of subject matter expertise and scientific excellence at key science agencies, which are essential for the scientific enterprise to best serve the American public.