

**Public Comment from the Federation of Associations in Behavioral & Brain Sciences
(FABBS)**

Re: Federal Register Docket No. OPM-2025-0004

Date: June 4, 2025

The Federation of Associations in Behavioral & Brain Sciences (FABBS) represents 32 of the nation's leading scientific societies in the psychological, cognitive, and behavioral sciences. Our mission is to advance the sciences of mind, brain, and behavior, promote evidence-based policymaking, and support the integrity and independence of the federal scientific enterprise. FABBS submits this comment in strong opposition to the proposed rule "Improving Performance, Accountability, and Responsiveness in the Civil Service."

Working closely with multiple federal agencies for over three decades, FABBS leadership rejects the premise of this proposed change: that career employees lack accountability or work intentionally to subvert Presidential directives. To the contrary, time and again, our members have found career civil servants – including scientific and technical experts at agencies such as the National Science Foundation (NSF), National Institutes of Health (NIH) and the Institute of Education Sciences (IES) – to be extremely well qualified, hardworking, and mission driven.

FABBS cautions that the proposed rule's framework for expanding Schedule F poses a profound risk to the integrity of science-based governance and the federal agencies that support it. The proposed reclassification would undermine the stated goals of this proposed change.

1. Undermines Scientific Integrity and Evidence-Based Policy

Replacing career experts with political appointees fundamentally threatens the independence and objectivity of science agencies. The rule would erode decades of protections that ensure federal research and grantmaking are guided by merit and peer review, not political expedience.

2. Compromises the Impartial Administration of Science Funding

Scientific funding decisions must be shielded from ideological interference. Agencies like NSF and NIH evaluate thousands of grant proposals annually through rigorous peer review. Introducing politically appointed staff into these processes risks degrading the objectivity, equity, and excellence of federal research investments.

3. Jeopardizes the Federal Scientific Workforce

The proposed rule would destabilize the dedicated civil servants who provide essential scientific, statistical, and programmatic expertise. Reclassifying these roles, with the intention of dismissing, invites the loss of institutional knowledge, demoralizes experts, and weakens our nation's ability to support cutting-edge research. Federal science agencies are already facing challenges in recruiting and retaining talent – this rule would make that task harder, further reducing our international standing.

4. **Puts Impartial Scientists at Risk if Findings Contradict the Administration**

By introducing job insecurity for those whose work may conflict with political interests, the proposed rule threatens the free expression of scientific findings. Such dynamics are antithetical to democratic principles and scientific progress.

5. **Erodes Public Trust in Federal Science and Data**

NSF, NIH, and IES are cornerstones of public confidence in data quality and research funding. Perceptions that key scientific roles are politically motivated, rather than merit-based, will diminish the credibility of government-funded research and the datasets that inform health, education, economic, and environmental policy.

FABBS urges the Office of Personnel Management and the Administration to withdraw this rule in its entirety. We support high standards of performance and accountability in the civil service, but these must be achieved through transparent, fair, and merit-based processes – not by undermining civil service protections and inviting political interference in scientific agencies.

Safeguarding the independence of the federal scientific workforce is not a partisan concern; it is a foundational principle of democracy and good governance. Our nation's innovation, public health, and global competitiveness depend on it.

Sincerely,

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