The Leadership
Conference

June 5, 2025

Charles Ezell
Acting Director
U.S. Office of Personnel Management
1900 E Street, N.W.
Washington, D.C. 20415

Re: Comment on Proposed Rule, "Improving Performance, Accountability and Responsiveness in the Civil Service" | Docket ID: OPM-2025-0004, RIN: 3206-AO80

Dear Acting Director Ezell,

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the civil and human rights of all persons in the United States, and its Census Task Force co-chairs, Asian Americans Advancing Justice | AAJC and NALEO Educational Fund, we appreciate the opportunity to submit comments in response to the Office of Personnel Management's (OPM) proposed rule, "*Improving Performance, Accountability, and Responsiveness in the Civil Service*," published in the Federal Register on April 23, 2025 (RIN 3206-AO05). We strongly oppose the proposed rule, as it poses a significant threat to the integrity and independence of the federal civil service.

This proposal would authorize the reclassification of tens of thousands of federal civil servants into a new "Schedule Policy/Career" category, an alarming effort to revive the defunct "Schedule F," which was rescinded in 2021 by President Biden through Executive Order 14003, *Protecting the Federal Workforce*, due to its profound threat to the integrity, impartiality, and stability of the federal civil service. Such a shift would fundamentally destabilize our professional, merit-based civil service and strip away longstanding protections that safeguard nonpartisan expertise. The consequences would be especially dangerous for federal statistical and scientific research agencies, whose independence and objectivity are critical to public trust and sound policymaking. Allowing political influence to reach into these roles would jeopardize the integrity of the data and research that shape critical decisions across the government, putting public trust and effective policymaking at serious risk.

We strongly support and echo the concerns outlined in the comment submitted by Democracy Forward and related stakeholders, which provides a comprehensive legal and policy analysis of the grave threats this rule poses to the federal civil service. Their comment demonstrates how the proposed rule would open the door to political interference, violate

long-standing civil service protections, and enable sweeping removals of expert career staff without cause. In these comments, we underscore the following additional concerns:

Politicization of Data and Erosion of Public Trust
Federal statistical agencies, including the U.S. Census Bureau, Bureau of Labor Statistics, and National Center for Health Statistics, are responsible for producing objective, accurate, and timely data that serve as the foundation for fair decisionmaking across all levels of government. Subjecting their career staff to political reclassification not only jeopardizes the integrity of the data but also risks distorting how federal programs are funded and evaluated. The chilling effect on data professionals, who may fear retaliation for producing politically inconvenient results, would erode public trust in vital datasets and reports.

Statistical professionals must be empowered to conduct their work free from political interference. Once trust in government data is compromised, the ripple effects are felt across sectors, affecting everything from civil rights enforcement and economic development to public health responses and disaster recovery.

Undermining Long-Term Planning and Research
Modernization efforts across federal data systems, including those required to prepare for the 2030 Census, require consistent leadership, institutional memory, and multi-year planning. These efforts rely on a stable workforce of highly trained statisticians, data scientists, and program managers. The proposed rule would increase the likelihood of politically motivated dismissals, disrupting continuity and planning efforts that cannot be sustained in an unstable environment.

This is particularly troubling as we approach 2030, when the Census Bureau must conduct major tests, finalize its 2030 Census design, and execute public outreach and operational planning. Reclassifying experienced civil servants jeopardizes these efforts, raising the risk of inefficiencies, cost overruns, and undercounts in marginalized communities.The recent dismantling of the Census Bureau's advisory committees further compounds this concern, representing a significant loss of institutional knowledge and community insight at a time when trusted expertise is most needed.

Conclusion
Reclassifying career civil servants into politically vulnerable positions would undermine the experience, stability, and nonpartisan expertise essential to effective and equitable governance. These changes would erode the foundation of a merit-based system that has long ensured the government serves the public interest, not political agendas.

A healthy democracy relies on a civil service that can do its job without political interference—one that protects the accuracy of our data, the independence of our scientific research, and our access to trustworthy information. This rule cuts at the core of those values. We strongly oppose the proposed rule and any effort to turn the federal workforce into a political tool.

Thank you again for your timely attention to this critical issue and request. If you have any questions, please contact Meeta Anand, senior program director of census and data equity at The Leadership Conference on Civil and Human Rights, at anand@civilrights.org.

Sincerely,

The Leadership Conference on Civil and Human Rights
Asian Americans Advancing Justice | AAJC
NALEO Educational Fund