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May 18, 2025

RE: Public Comment in Response to Improving Performance, Accountability and Responsiveness in the Civil Service [\[Docket No. OPM-2025-0004\]](#)

To whom it may concern:

On behalf of the over 3,000 members of the Population Association of America (PAA) and more than 40 population research centers nationwide comprising the Association of Population Centers (APC), we are writing to comment on the proposed rule, "Improving Performance, Accountability, and Responsiveness in the Civil Service (Docket No. OPM-2025-0004)."

PAA and APC are two affiliated organizations representing scientists, including demographers, economists, sociologists, and epidemiologists in the public, private, and academic sectors who study the causes and consequences of population change. Their expertise covers a wide range of issues including population aging, adolescent health, work and workforce, family dynamics, fertility, mortality, and disability. Population scientists compete for funding from federal scientific research agencies and rely on data produced by federal statistical agencies to support their research, evaluation, and training activities. Given the essential roles federal agencies play in supporting our field, we are writing to express our strong concerns regarding the potential implications of the proposed rule.

Impact on Federal Statistical Agencies

The proposed rule, "Improving Performance, Accountability and Responsiveness in the Civil Service," would call into question the objectivity of federal statistical data used to inform evidence-based policymaking. The federal statistical system plays an essential role in improving the lives of all Americans as well as informing critical policy decisions with data that are timely, relevant, and accurate. Federal statistical agencies are particularly vulnerable to the proposed rule due to the following:

Politicization: Reclassifying career civil servants serving in positions of a "confidential, policy-determining, policy-making, or policy advocating character," threatens the ability of these professionals to conduct their work in an independent, objective manner without fear of retribution. Federal agency officials and employees must be allowed to produce and disseminate objective, accurate, and timely data. The proposed rule could potentially compel federal statistical employees to abandon these pursuits for fear of generating data that are unfavorable to the President's policy agenda. They might also be pressured

to change methodologies or reveal pre-release information. By making it easier to remove employees if a President determines that they are interfering with his or her policies, it increases the potential for passivity or political loyalty to be prioritized over expertise and experience. Politicization has had dramatic consequences for statistical agencies and their leaders in other countries, notably Argentina and Greece, and impacted the ability of our colleagues in these countries to access valid data and conduct rigorous scientific research.

Importance of Trust, Impartiality and Objectivity: Statistical agencies, such as the Bureau of Labor Statistics, the Census Bureau, and the National Center for Health Statistics, need professional autonomy to provide impartial, objective, reliable data. Professional autonomy is the ability to act independently from political or other undue external influence regarding its operations, such as data collection and analysis, staffing, and publications. Erosion of professional autonomy in the operations of statistical agencies, which the proposed rule threatens, would undermine their perceived or actual independence, leading to a loss of public trust in the data they produce.

Erosion of Expertise, Increased Turnover, Decreased Employee Morale: Federal statistical agencies rely on highly specialized professionals, including statisticians, economists, and data scientists, who possess unique technical expertise and long-term institutional memory. These agencies stand to lose experts who see their career paths as less secure and merit-based than before. The loss of these experts or frequent turnover in key positions could disrupt agency operations, hinder long-term planning, undermine the agency's ability to fulfill its mission, and impair the quality and accuracy of the data. Further, the uncertainty and fear of arbitrary dismissal could negatively impact employee morale, leading to decreased productivity and difficulty in attracting and retaining top talent.

Importance of Modernization, Research, and Data Continuity: To support their missions, statistical agencies must invest in long-term efforts such as extensive research, critical modernization projects, and efforts to ensure data access and continuity. Schedule Policy/Career could subject agencies to changing presidential priorities, increasing senior staff turnover and disrupting modernization efforts, measurement of trends, and meaningful research.

Impact on Federal Scientific Research Agencies

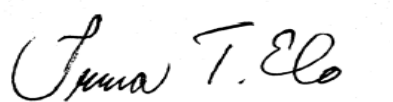
Federal scientific research agencies, most notably the National Science Foundation (NSF) and National Institutes of Health (NIH), rely on the integrity of their workforce to inform the nation's scientific enterprise. Program officers with scientific expertise are responsible for developing relevant funding opportunities. Other personnel oversee the peer review processes that these agencies use to ensure only the most competitive research applications are funded. Staff with grants management and other financial expertise guarantee precious federal dollars are appropriately allocated and accounted for by award recipients.

The Office of Personnel Management estimates that 50,000 positions, or approximately 2 percent of the federal workforce, will ultimately be reclassified into Schedule Policy/Career. It is not clear to our organizations if any scientific program officer positions at the NIH and/or NSF could be affected. Many of the concerns we expressed about the impact of the proposed rule on the federal statistical agencies' workforce applies to NIH and NSF personnel as well.

Our organizations believe scientists and other related personnel at these agencies must be permitted to conduct their work without fear of being suddenly removed from their positions without cause. Progress in the biomedical, behavioral, social, physical, and life sciences is contingent upon the ability of our federal scientific research agencies to conduct their work without undue political influence or interference. The proposed rule potentially jeopardizes the necessary freedoms and independence these agencies and their workforces need to fulfill their missions and advance scientific progress.

Thank you for considering our views regarding the proposed rule.

Sincerely,

A handwritten signature in black ink, reading "Irma T. Elo". The signature is fluid and cursive, with the first name "Irma" being more prominent.

Dr. Irma T. Elo, President
Population Association of America

A handwritten signature in black ink, reading "Sarah Burgard". The signature is fluid and cursive, with the last name "Burgard" being more prominent.

Dr. Sarah Burgard, President
Association of Population Centers