

**May 14, 2025**

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

Re: "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:

**Ronald E. Alper** submits these comments regarding Office of Personnel Management's (OPM) Proposed Rule "Improving Performance, Accountability and Responsiveness in the Civil Service," 90 Fed. Reg. 17182 (April 23, 2025).

I write to express opposition to the Proposed Rule.

**I have been a federal employee for over 26 years. I retired on March 31, 2025, but may seek future federal employment.**

**A politicized civil service would have an extremely negative impact on the federal government and its service to the American people. The current system allows federal employees to serve without fear or favor. I know from my professional experience as a civil servant that the proposed rule would interfere with federal employees' ability to carry out their duties in a fair and impartial manner. Federal employees would live in fear of voicing their honest opinion if it differed from their agency's management or the presidential administration. If civil servants feared they would be disciplined for voicing professional opinions that administration leadership did not like, then the fair and impartial conduct of the government's business would be harmed. If civil servants were hired, not based primarily on expertise, then the conduct of the agency's business would also be severely harmed. If large parts of the civil service regularly turned over when a new president was elected, whether Democrat or Republican, there would be no consistency or institutional memory in the federal government.**

**Contrary to the current administration's assertions, there is no deep state; it does not exist. I have worked in state government for 10 years and the federal government for over 26 years and never came across any evidence of any deep state. The deep state is a lie manufactured by the current administration to demonize federal employees, as the current administration has demonized others who disagree with it.**

**The proposed rule undermines more than 140 years of civil service reform following the spoils system. It opens the door to politically motivated firings and tramples on employees' constitutional and statutory rights. This proposal destabilizes the career workforce, politicizes the day-to-day work of government, and erodes the very idea of a professional, independent civil service.**

**This proposed rule purports to "improve accountability," but is, in fact, a way to dismantle the independent career civil service in roles important to the American people. By reviving the controversial "Schedule F" under the new name, "Schedule Policy/Career," the rule would remove**

due process protections granted by Congress for untold numbers of federal employees in what the current administration decides are “policy influencing” roles so that they serve at the pleasure of the President.

This proposal gives lip service to performance management, but rather than providing thoughtful reform, it weaponizes the classification of “policy-influencing” roles to make it easier to purge career staff. It is the latest attempt from this administration to replace professionalism with ideological alignment.

The proposed rule would dramatically expand the number of civil servants who serve at the pleasure of the President from approximately 4,000 political appointees to potentially hundreds of thousands of what had been career employees.

OPM makes sweeping claims about political “resistance” in the civil service based on cherry-picked anecdotes and selective surveys, using these to justify maximalist removal authority.

This proposed rule would discourage career civil servants from providing their uncensored opinions and from fully applying their expertise for the benefit of the American people. This would erode public trust in neutral governance.

This proposed rule would undermine the draw of mission-driven work in federal employment and make it harder for the federal government to recruit and retain talent.

For the reasons stated above, I oppose the proposed rule.

Sincerely,

**Ronald E. Alper**