

**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,

My name is Casey Bishopp, and I submit this comment in strong opposition to the Proposed Rule titled *“Improving Performance, Accountability and Responsiveness in the Civil Service.”* I write as a public health professional who has worked across global and domestic systems to improve access to care and who deeply values the integrity of a nonpartisan civil service.

For the past several years, I have worked in public health communications, leading demand generation and behavior change campaigns in the HIV prevention and treatment space. This work, much of it funded or influenced by public sector institutions, has relied on the support of skilled, apolitical civil servants who bring scientific rigor and professional continuity to government programs. My experience has shown me that when civil servants are protected—able to speak freely, stay through transitions in political leadership, and operate based on merit—our systems function better, and the public is better served.

This Proposed Rule threatens that foundation. By expanding the ease with which federal employees can be disciplined or dismissed and by weakening due process protections, OPM opens the door for political interference in what should be evidence-based governance. If these changes are implemented, we risk turning professional roles into revolving-door appointments that swing with political winds—undermining institutional knowledge and the long-term programs that rely on it.

In particular, I oppose the sections of the Proposed Rule that:

- **Permit expedited removal of career civil servants with less transparency or recourse** (e.g., proposed changes to 5 CFR Part 752).
- **Dilute performance improvement periods**, thereby reducing opportunities for correction or development before punitive action.
- **Fail to provide evidence that these changes will improve actual performance outcomes**, instead relying on vague assertions of increased “accountability.”

From my perspective in global public health, I’ve seen firsthand the damage that occurs when civil services become politicized. Public trust erodes. Data gets manipulated or ignored. Critical services—like HIV prevention programs that rely on stable, evidence-driven leadership—suffer. If these rules were applied to our international partners, they would compromise the very systems we work to strengthen through U.S. support. We must not model the same instability and politicization we seek to help others overcome.

The Proposed Rule also ignores the long-term value of civil servants who bring cultural competency, historical program knowledge, and deep technical expertise to their roles. These qualities are not easily replaced, and their loss cannot be offset by “efficiency.” I know from managing communications with multiple stakeholders—from Ministries of Health to on-the-ground service providers—that continuity and neutrality are essential to building systems that serve people equitably, especially those most marginalized.

I urge OPM to withdraw this Proposed Rule in its entirety. If the goal is to improve accountability and performance, those goals can and should be pursued through investments in training, robust supervision systems, and clear performance standards—not by weakening the protections that uphold the impartiality and integrity of our civil service.

Sincerely,  
Casey Bishopp