Testimony of Dr. Danny de Gracia on the proposed rule:
"Improving Performance, Accountability and Responsiveness in the Civil Service"
by the Personnel Management Office

5 CFR Parts 210, 212, 213, 302, 432, 451, and 752

[Docket ID: OPM-2025-0004]

RIN 3206-AO80

Thank you for the opportunity to submit comments in opposition to the proposed rule "Improving Performance, Accountability and Responsiveness in the Civil Service." This proposed rule rightly quotes the previous Biden administration citation that Schedule F undermines the foundations of the civil service and its merit system principles, which were essential to the Pendleton Civil Service Reform Act of 1883's repudiation of the spoils system.

While I understand that the newly re-elected Donald J. Trump administration wishes to have an Executive Branch that is in alignment with its ideological beliefs and perceives that loyalty to the president is paramount, this sets a precedent that can potentially result in massive upheaval every single time there is a new presidency. In effect, should this rule be established, every four or eight years depending on who is in power, the next executive can purge the entire government, top to bottom. Appealing as that may be to some, it creates a series of questions of how in the post-WWII era, when we value continuity of governance and institutional expertise, can our government be anything but schizophrenic if the whole bureaucracy can be purged.

I do not accept the OPM's assertion that "chapter 43 and 75 procedures make it very difficult for agencies to hold employees accountable for their performance or conduct." This is less a matter of "difficulty" and more supervisors not having the patience to follow process, adequately document, and work with employees to correct or discipline bad behavior.

I want attention-to-detail, expertise, and the highest level of acumen in my federal government. This is achieved by having a permanent bureaucracy that is immune to the wild swings of democracy, whether the party we prefer is in power or out of power.

Thank you for the opportunity to testify.