



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

June 6, 2025

Office of Personnel Management
Regulatory Affairs Division
1900 E Street NW
Washington, DC 20415

RE: Comment on Proposed Rule “Improving Performance, Accountability and Responsiveness in the Civil Service” (RIN 3206-AO01)

BGA unifies labor unions and environmental organizations into a powerful force to fight climate change, protect the health of people and the environment, stand against economic and racial inequality, and create and maintain good-paying, union jobs in communities across the country. We write in strong opposition to the Office of Personnel Management’s proposed rule titled “*Improving Performance, Accountability and Responsiveness in the Civil Service*,” published on April 23, 2025. Contrary to its stated intentions, this proposed rule would severely undermine the integrity and professionalism of the federal civil service by reviving and expanding upon the discredited “Schedule F” policy from the first Trump administration—rebranded as “Schedule Policy/Career.”

If enacted, this rule would obliterate longstanding protections for career federal employees by wholesale reclassifying “policy-influencing” roles into a newly created excepted service category lacking merit system safeguards. This would effectively transform tens or even hundreds of thousands of nonpartisan public servants into at-will employees who could be terminated for political or ideological reasons. Such a shift represents the most extreme attempt in modern history to politicize the career federal workforce.

The proposed rule relies on anecdotal and selectively interpreted survey data to justify the sweeping claim that the civil service is obstructive or unaccountable. Rather than presenting substantive evidence of widespread performance issues or misconduct, OPM’s rationale leans heavily on politically charged narratives about “resistance” within the workforce. These assertions do not justify dismantling the merit-based system upon which our federal civil service has operated for over 140 years, imperiling workers, the environment, and public health.

Stripping away civil service protections does not improve accountability, it introduces instability, erodes employee morale, and threatens the fundamental principle that government should serve the public, not political interests. OPM should withdraw this destructive, politically motivated rule.