

June 6, 2025

Mr. Noah Peters
Senior Advisor to the Director
Office of Personnel Management (OPM)
1900 E St NW
Washington, DC 20415

Dear Mr. Peters,

The American Society of Human Genetics (ASHG) appreciates the opportunity to comment on the Office of Personnel Management's (OPM) proposed rule on "**Improving Performance, Accountability and Responsiveness in the Civil Service**," Docket ID: OPM-2025-0004, RIN 3206-AO80. ASHG is the world's largest professional society dedicated to advancing genetics and genomics research, supporting a community of 8,000 members. Our members represent all areas of research and application in human genetics and share the common goal of encouraging people everywhere to realize the full potential and benefits of human genetics and genomics.

ASHG deeply understands the vital role that career civil servants, especially scientists, play in ensuring sound, evidence-based policy across the biomedical research enterprise. As our nation advances the frontiers of scientific possibility, federal agencies like the National Institutes of Health (NIH) need leadership that can keep up with the nuanced and technical nature of emerging biomedical research topics. As a result, ASHG is deeply concerned with how this proposed rule will impact leadership at nonpartisan agencies like the NIH and urges you to reconsider its implications on scientific expertise and credibility, continuity and stability of biomedical research, and insulation from political pressure.

Scientific Expertise and Credibility

Implementing solutions to address complex research issues requires years of scientific and technical training to understand the full scope of impacts these decisions will have on the research community. This is why the needs of the scientific community are best understood and represented by individuals who have faced these complex issues directly. Maintaining scientists at the helm of agency leadership is essential to retaining scientific expertise within federal agencies, as well as managing and overseeing merit-based peer review of research proposals. When scientific expertise is a requirement for NIH leadership, our nation's premier biomedical research agency can guarantee that research priorities are based on decades of evidence used to guide future directions. This ensures that biomedical research remains nonpartisan, and that leadership is held accountable to sound scientific evidence as the foundation for policy decisions.

Scientific expertise is particularly vital in rapidly evolving fields like human genetics and genomics, which has made incredible progress, leading to revolutionary breakthroughs and treatments that are improving public health and quality of life for people nationwide. Preserving scientific expertise in leadership positions, including institute or center directors, ensures that the agency is well-equipped with the tools and knowledge base needed to effectively implement human genetics and genomics research and policies throughout NIH institutes and centers.

ASHG Comment on Proposed Rule on “Improving Performance, Accountability and Responsiveness in the Civil Service,” Docket ID: OPM-2025-0004, RIN 3206-A080.

Continuity and Stability

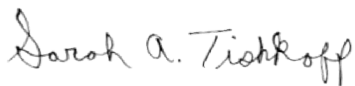
The proposed rule also poses a threat to the continuity and stability of institutional knowledge at NIH by weakening protections for scientific leadership at the agency. For decades, NIH has turned billions of dollars in taxpayer investments into lifesaving treatments and interventions, making significant strides from generation to generation. In FY 2024, for every \$1.00 awarded to researchers in the 50 U.S. states and the District of Columbia, \$2.56 in economic impact was generated in return. Such progress depends on shielding science from political influence to maintain essential institutional expertise. For example, if political appointees are made responsible for deciding scientific priorities, key research portfolios and findings risk being lost each time a new President takes office. This leads to instability in scientific progress, hinders the ability to consistently fund promising research areas, and fosters an environment vulnerable to shifts with each election cycle.

Insulation from Political Pressure

Civil servants with decades of experience in human genetics and genomics research can and should be able to make evidence-based decisions free from political pressure or influence. For this reason, ASHG is deeply concerned when the proposed rule states that “*career federal employees use their positions to advance their personal political or policy preferences instead of implementing the elected President’s agenda*” which “*undermin[es] democracy, as it enables government power to be wielded without accountability to the voters or their elected representatives.*” In order to ensure that NIH remains a nonpartisan federal agency, scientists in NIH leadership positions must be free to dissent from any political opinion that is not rooted in science. When science remains at the forefront of policy, the research community is able to preserve scientific integrity without fear of termination or persecution.

Thank you for the opportunity to comment on this proposed rule and to help elucidate some of the primary concerns related to the role of scientists in key federal agencies. We welcome the opportunity to work with you and your staff as you further consider ways to improve performance, accountability, and responsiveness across federal agencies. Please feel free to contact Karina Miller (kmiller@ashg.org) with any questions.

Sincerely,



Sarah Tishkoff, Ph.D.

President, American Society of Human Genetics