



By electronic submission via www.regulations.gov

November 17, 2023

Kiran Ahuja
Director
U.S. Office of Personnel Management
1900 E St NW
Washington, DC 20415

Re: Comment on Proposed Rule concerning Upholding Civil Service Protections and Merit System Principles | Docket ID: OPM-2023-0013

Dear Director Ahuja:

We are deans and directors of schools of public service from universities around the country. We are writing in response to the Office of Personnel Management's (OPM) proposed revisions to and clarifications of civil service protections and the application of merit system principles to career federal employees.

Together, we possess significant expertise on government and are driven by a profound commitment to the performance of our democratic institutions. We prepare undergraduate and graduate students for careers in public service through degrees in public administration, public policy, public affairs, and international affairs. Collectively, our student bodies represent thousands of future public servants and citizens.

We are also members of the Deans Summit, a forum for innovation and collaboration convened by the Volcker Alliance for approximately 60 deans and directors of the nation's schools of public service. One of the areas where we partner is around promotion of public service at all levels of government. As a nonpartisan nonprofit founded in 2013 by former Federal Reserve Board chairman Paul A. Volcker, the Volcker Alliance is dedicated to advancing his vision of a public sector workforce with the experience, preparation, and commitment to ensure government is accountable and delivers with excellence.

Our group also includes the leaders of the Network of schools of Public Policy, Affairs, and Administration (NASPAA). NASPAA is the global standard in public service education and a nonprofit 501(c)(3) membership association with over 300 institutional member schools at U.S. and non-U.S. universities that award degrees in public administration, public policy, public affairs, nonprofit and related fields. NASPAA is the recognized global accreditor of master's degree programs in these fields.

As a collaborative network of leaders of schools of public service, we are committed to creating pathways for professionally educated and trained students to serve the American people. We

have come together to express our collective support for OPM’s proposed rule to uphold civil service protections and merit system principles.

One of the keys to our democracy’s success is the independence and expertise of the civil service, which ensures sustained delivery of essential services to the American people irrespective of administration. Elected representatives and political appointees change with the political tides, but civil servants provide the backbone of continuity and expertise for the federal government to deliver on the many policy promises passed into law by elected officials. While leaders in the executive branch shape implementation of agency programs, the agencies and their staff are the stewards of the vital programs created, funded, and given direction by acts of Congress.

The American people and the federal government rely on experienced and qualified civil servants shielded from political pressures to guarantee that programs are managed in the public interest and advance the goals of legislation passed by Congress. As deans and directors with extensive experience studying government, serving in government roles, and training future professionals for the federal government, we deeply understand the value of a professional civil service protected from political interference. This tenet is essential for continuous and competent delivery of federal programs and also the federal government’s ability to restore and sustain public trust in our democracy.

We urge this Administration and future Administrations to pursue civil service reforms that improve the efficiency and effectiveness of government operations and promote accountability to the public interest by following the laws passed by Congress and signed by the President. Merit system principles and civil service protections—including for career staff serving in Senior Executive Service positions – should be pillars of any reforms.

We express our wholehearted support for the intent of OPM’s proposed rule to clarify the protections afforded to civil servants, ensure merit system protections for employees currently serving in career staff roles, and protect senior civil servants from further exposure to political pressures.

Thank you for taking the time to consider our views, and for OPM’s efforts to ensure that the American people are served by highly qualified, experienced, and dedicated civil servants in the management of important federal programs.

Sincerely,

The Volcker Alliance

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