

June 5, 2025

Charles Ezell  
Acting Director  
Office of Personnel Management  
1900 E Street, NW  
Washington, DC 20415

Re: Improving Performance, Accountability and Responsiveness in the Civil Service  
RIN: 3206-AO80  
Docket ID: OPM-2025-0004

Dear Acting Director Ezell:

This comment is submitted on behalf of the Volcker Alliance, a nonprofit organization founded by Paul A. Volcker, a lifelong public servant and former Chairman of the Board of Governors of the Federal Reserve System. Our mission is to empower the public sector workforce to address the pressing challenges facing our nation. We uphold long-standing American principles, reflected in the vision of our founder, that public service is a high calling and that government serves its citizens best when staffed by qualified, experienced, and committed professionals selected and retained based on merit.

The proposed rule, *Improving Performance, Accountability and Responsiveness in the Civil Service*, would upend these principles and undermine the ability of our federal agencies to meet their commitments to Americans. At its core, the proposed rule would prioritize political or partisan loyalty over merit and expertise across the federal enterprise.

The proposed rule is exceptionally broad, with minimal bounds on “policy-influencing” roles subject to reclassification that could conceivably cover most federal employees. Large-scale reclassifications and subsequent dismissals pose enormous potential for abuse and risk a loss of institutional knowledge and operational continuity. In turn, the implied threat of such reclassifications and dismissals would constitute a chilling effect on career professionals by discouraging candid, rigorous analysis that would be detrimental to Americans and disadvantageous to the President’s appointees, who rely on the expertise of nonpartisan civil servants when making policy decisions.

Taken together, these incentives are a recipe for poor management and less effective governance in the near term. This danger has long been recognized by senior federal leaders and was reflected at the core of the findings of the National Commission on the Public Service (“Volcker Commission”), led by our founder. The Commission warned in its final report, *Leadership for America*, that while the President of course needs political appointees to implement his agenda,

excessive numbers of political appointees serving relatively brief periods may undermine the President's ability to govern, insulating the Administration from needed dispassionate advice and institutional memory. The mere size of the political turnover almost guarantees management gaps and discontinuities, while the best of the career professionals will leave government if they do not have challenging opportunities at the sub-cabinet level.<sup>1</sup>

We are especially concerned about the long-term implications of the proposed rule on sustaining a strong pipeline of public servants into the future, which the Administration has identified as a strategic priority in its Merit Hiring Plan.<sup>2</sup> The Volcker Alliance stewards networks of aspiring public servants at a large, national coalition of universities, especially public and land-grant universities, and we aim to be a partner to governments seeking urgently needed talent. In our work, we hear directly from students across a wide variety of disciplines about their passion to pursue impactful careers where they can bring their talents to contribute to our nation. The proposed rule risks repelling the very rising leaders the federal government is aiming to recruit.

The Government Accountability Office has long documented the federal government's shortcomings in recruiting and retaining talented professionals, especially in hard-to-hire fields such as technology, health and medicine, economics and finance, and cybersecurity.<sup>3</sup> Administrations of both parties have pursued hiring and pay flexibilities intended to address these longstanding talent pipeline challenges. The proposed rule would introduce a new degree of instability, career precarity, and politicization into vast swaths of the federal workforce and send a powerful, negative signal to talented professionals like those in our networks that federal service is not a prudent career choice.

The need for federal workforce reforms that strengthen effectiveness, performance, and accountability is real and long-standing. But so too is the imperative of a comprehensive reform agenda. The principles articulated in *Renewing America's Civil Service*, a collaboration of the Volcker Alliance and the Partnership for Public Service, are a useful place to start.<sup>4</sup>

The proposed rule is the wrong approach—risking a loss of present capacity, weakening federal agencies' abilities to recruit the next generation of public servants, and undermining continuity of government. It would take a further step down the path forewarned by the Volcker

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<sup>1</sup> National Commission on the Public Service, *Leadership for America: Rebuilding the Public Service* (Washington, DC: National Commission on the Public Service, 1989), 7.

<sup>2</sup> Vince Haley and Charles Ezell, *Merit Hiring Plan* (official memorandum, Washington, DC: U.S. Office of Personnel Management, May 29, 2025), <https://www.chcoc.gov/content/merit-hiring-plan>.

<sup>3</sup> U.S. Government Accountability Office, *High-Risk Series: Heightened Attention Could Save Billions and Improve Government Efficiency and Effectiveness*, GAO-25-107743 (Washington, DC: GAO, February 2025), <https://www.gao.gov/products/gao-25-107743>.

<sup>4</sup> Partnership for Public Service and the Volcker Alliance, *Renewing America's Civil Service* (Washington, DC: Partnership for Public Service; New York, NY: The Volcker Alliance, May 2018), <https://www.volckeralliance.org/sites/default/files/Renewing-Americas-Civil-Service.pdf>.

Commission: “If these trends continue, America will soon be left with a government of the mediocre, locked into careers of last resort or waiting for a chance to move on to other jobs. *But this need not and should not be.*”<sup>5</sup>

Respectfully submitted,

Sara Mogulescu  
President

Melissa Austin  
Chief Operating Officer

Peter Morrissey  
Senior Director, Talent and Strategy

Maggie Mello  
Senior Director, Public Service Education

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Senior Director, Public Finance

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<sup>5</sup> National Commission on the Public Service, *Leadership for America*, 4.