

# Step-by-Step Guide: Organization Commentators

The following is a brief guide for organizations intending to write a comment in opposition of the federal government's new proposed rule: "Improving Performance, Accountability and Responsiveness in the Civil Service." A link to that rule is [here](#) and you can submit a comment [here](#).

---

**[Date]**

Office of Personnel Management  
1900 E Street, N.W.  
Washington, DC 20415

Re: "Improving Performance, Accountability and Responsiveness in the Civil Service,"  
Proposed Rule, 90 Fed. Reg. 17182, Docket ID: OPM-2025-0004

Dear Office of Personnel Management:

**[Identity of Organization]** submit(s) these comments [in opposition of] Office of Personnel Management's (OPM) Proposed Rule "Improving Performance, Accountability and Responsiveness in the Civil Service," 90 Fed. Reg. 17182 (April 23, 2025). **[We]** write to express opposition to the Proposed Rule.

## Introduction

### 1. Who are you?

- As an organization, describe your mission and how you accomplish it.
- Directly tie your mission to the proposed rule (as in, what expertise or perspective does your organization bring to comment on this regulation?)
- Describe the people or communities your organization represents and/or serves.
- Briefly describe how the people or communities served might be affected by the proposed rule.

## 2. Why does this matter to your organization?

Federal law has long said that civil servants must be hired, promoted, and retained based on merit—basically: expertise, not political loyalty. Civil servants have had certain protections that have ensured they could exercise their best professional judgment without fear of retaliation for saying or doing something simply because it was unpopular with leadership.

- If those protections were taken away, and the civil service was substantially reduced and/or staffed only with political loyalists, how would that affect your organization and the people you represent/serve? Briefly explain here.

## Your Argument and Analysis

### 1. Get Specific: Identify *which parts* of the Proposed Rule you agree or disagree with

- Identify the relevant part(s) of the regulation you are commenting on and clearly state your opposition or support for each.
- Are there certain sections that you think are particularly incorrect or would lead to particularly bad results for your organization, its members or the people you represent or serve? If so, list (a bulleted list is fine) all the relevant part(s) of the proposed rule you plan to comment on and clearly state your disagreement with them.

### 2. Explain Any Negative Impacts the Proposed Rule Will Have

Use your organization's own perspective and/or expertise to describe to OPM why you oppose the Proposed Rule by explaining in detail what harm(s) you think it would cause for your organization. Of course, the Administration has already reduced the size of the civil service and you should feel free to discuss the damage that has already done.

Below are some prompts that may be helpful, but **it's even better to put things in your own words and get specific** (otherwise the agency might think your comment is the same as others and not appreciate your unique perspective and arguments):

- If the size of the civil service shrank considerably...
  - I know from my own experience as an organization [that relied on/ whose members relied on XYZ services] from [X government agency] that considerably shrinking that agency would cause the following harms...
  - Based on the cuts to the federal civil service that have already happened during this Administration, our organization has already seen the following harms...

- If civil servants were hired not based primarily on expertise ...
  - I know from my own experience as an organization [that relied on/ whose members relied on XYZ services] from [X government agency] that considerably shrinking that agency would cause the following harms...
- If civil servants feared they would be disciplined for voicing professional opinions that Administration leadership did not like...
  - I know from my own experience as an organization [that relied on/ whose members relied on XYZ services] from [X government agency] that it would cause the following harms ...
- If large parts of the civil service regularly turned over when a new president was elected...
  - I know from my own experience as an organization [that relied on/ whose members relied on XYZ services] from [X government agency] that considerably shrinking that agency would cause the following harms...
- Include any additional reason you oppose the Proposed Rule, being as specific as possible about your reasoning and the part(s) of the Proposed Rule you oppose.

### 3. Point Out Where the Proposed Rule Lacks Proper Factual Support

Highlight any factual inaccuracies, lack of factual support, or things that just don't make sense in OPM's [justification](#) for the Proposed Rule. Read through OPM's reasoning, and think about your own experience/expertise. Ask yourself:

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>✗ Does anything specific jump out as incorrect?</li> <li>✗ Are there any logical leaps you don't think are justified?</li> </ul> | <ul style="list-style-type: none"> <li>✗ Are there places where actual facts are missing that could support or undermine whatever position OPM is taking?</li> <li>✗ Is there something that OPM is simply missing?</li> </ul> |
|---|--|

**Remember, be specific!** Write out what specific part or section you take issue with and describe what in that section is wrong, unsupported, too big of a leap. Explain how your organization's background, experience or expertise leads you to that conclusion, and if relevant include accurate information you think OPM should consider instead.

### Recommendations

- If relevant, offer specific recommendations about changes you would make to the Proposed Rule. If the best change you see would be *not* to implement the entire rule or certain parts of it, you can say that.

## Conclusion

- Here, you can write out a brief summary of your position and re-list any recommendations you would make to change this Proposed Rule.

Sincerely,

**[Your organization and relevant employee name(s)]**

**Note: Public comments are *public*.** If you do not want your regular email address listed, consider creating another email address for this purpose and not including other personal information (such as a phone number or physical address) that you don't want made public. You can also comment anonymously, and you may choose to do so if you fear reprisal for submitting comments. However, lending your name can lend credibility and context to what you say.

### ABOUT US

Protect Democracy is a nonpartisan, nonprofit group working to prevent American democracy from declining into a more authoritarian form of government.

*This publication should not be construed as legal advice on any specific facts or circumstances. The contents are intended for general information and educational purposes only, and should not be relied on as if it were advice about a particular fact situation. The distribution of this publication is not intended to create, and receipt of it does not constitute, an attorney-client relationship with Protect Democracy. This publication also contains hypertext links to information created and maintained by other entities. Protect Democracy does not control or guarantee the accuracy or completeness of this outside information, nor is the inclusion of a link to be intended as an endorsement of those outside sites.*