



May 23, 2025

Charles Ezell  
Acting Director, Office of Personnel Management  
Washington, DC

RE: 5 CFR Parts 210, 212, 213, 302, 432, 451, and 752  
[Docket ID: OPM-2025-0004]  
RIN 3206-AO80

Dear Acting Director Ezell:

We are writing on behalf of the Infectious Diseases Society of America (IDSA) and HIV Medicine Association (HIVMA) to strongly oppose the proposed rule that would create a new Schedule Policy/Career category of federal employment. IDSA is a community of 13,000 clinicians, scientists and public health experts working together to solve humanity's smallest and greatest challenges, from tiny microbes to global outbreaks. Within IDSA, HIVMA is a community of more than 6,000 physicians and other health care professionals who work on the frontlines of the HIV epidemic in communities across the country.

The federal civil service workforce is the bedrock of our country's public health and research infrastructure that keeps communities healthy and safe by controlling infectious diseases through prevention, diagnosis and treatment and advancing innovative scientific discoveries that will strengthen our ability to prevent, detect, treat and cure infections that are life-threatening and costly to the health care system. IDSA and HIVMA greatly appreciate the opportunity to comment on this proposed rule that if implemented could compromise the health of all Americans.

### **Civil Service Protections Help Ensure Expert, Evidence-Based, Non-Partisan Policy Making**

The current protections for civil service positions, including those in policymaking positions, are intentional to ensure the integrity and stability of a civil service workforce free from political influence. These protections are particularly important for those with policymaking authority to better ensure that decisions are made by staff with the appropriate experience and expertise without regard to political party affiliation. The current system helps to ensure that decisions are made in a nonpartisan manner and that civil service workers can carry out their duties based on the best available evidence and in

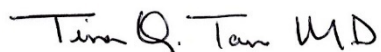
the public's interest without undue political influence or retaliation. These protections are a shining example of our country's strong commitment to democracy.

We strongly agree that it is important to ensure a high performing and effective federal workforce. We believe that the existing rules and regulations for civil service provide the appropriate mechanisms for addressing performance issues while balancing the need to maintain a professional and qualified federal workforce with the experience and expertise necessary to maintain vital services and make policy decisions in the best interest of all. Current policies already provide multiple layers of accountability, including accountability to political appointees in the executive branch and elected officials in Congress, and this accountability should be maintained. While we recognize and appreciate that a new Administration brings new policy priorities, our country's public health and health security depend on these priorities being implemented by an experienced non-partisan civil service workforce. In fact, the civil service workforce has been instrumental in successfully carrying forward initiatives of previous administrations from both parties.

We urge OPM to withdraw the proposed rule and to fully support and leverage the extraordinary contributions that the federal civil service workforce can make to efforts to improve the health and public health of our country while lowering health care costs.

Thank you for the opportunity to comment on the proposed rule. Please contact the IDSA Senior Vice President of Public Policy and Government Relations Amanda Jezek at [ajezek@idsociety.org](mailto:ajezek@idsociety.org) or the HIVMA Executive Director Andrea Weddle at [aweddle@hivma.org](mailto:aweddle@hivma.org) with any questions regarding our comments.

Sincerely,



Tina Tan, MD, FIDSA, FPIDS, FAAP  
President, IDSA



Colleen Kelley, MD, MPH, FIDSA  
Chair, HIVMA