Dear Colleagues:

The administration is planning to implement Schedule F. This allows the conversion of civil service positions (with the associated protections) to positions where incumbents can be terminated at will over lack of alignment with administration goals.

The part of the proposed regulation that is most relevant to NIH is the following:

Substantive participation and discretionary authority in agency grantmaking, such as the substantive exercise of discretion in the drafting of funding opportunity announcements, evaluation of grant applications, or recommending or selecting grant recipients. Grantmaking is an important form of policymaking, so employees with a substantive discretionary role in how federal funding gets allocated may occupy policymaking positions.

This has the potential to convert positions such NIH institute and center directors, divisions directors, and, perhaps, others, into essentially political appointees.

There is still a week left for submission of public comments.

See <https://www.federalregister.gov/documents/2025/05/23/2025-09356/improving-performance-accountability-and-responsiveness-in-the-civil-service>

**Here is the link to make a comment:**

<https://www.regulations.gov/commenton/OPM-2025-0004-0001>

Note that the deadline was extended after ~30,000 comments were submitted, the majority of them critical of the proposed regulation.

**Further note that these comments are essential if the proposed rule is going to be implemented. The government must respond to the submitted comments and failure to do so can be crucial in future litigation.**

Please share your thoughts and encourage your faculty and others to do likewise prior to the deadline.

All have important roles to play in shaping government regulations.