



Improving Performance, Accountability and Responsiveness in the Civil Service

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Thank you for the opportunity to comment on the proposal, "Improving Performance, Accountability and Responsiveness in the Civil Service." I strongly disagree with both the premise behind the proposed rule and the rule itself for reasons I outline below.

The first sentence of the "supplementary information" says, "OPM proposes this rule to strengthen employee accountability and the democratic responsiveness of American government, while addressing longstanding performance management challenges in the Federal workforce." The evidence that OPM provides on employee accountability in the preamble to the proposed rule largely relies on surveys that discuss the failures by lower level career civil servants, not the ones in "policy-influencing" positions. So even if there is a problem due to poor performance, (which I would not concede but remain open to), this rule will do nothing to address it (and I suspect may exacerbate it).