

7 February 2013

John Berry
Director
U.S. Office of Personnel Management
1900 E Street NW
Washington, DC 20415

Dear Mr. Berry,

As you undoubtedly recall, for a number of years, a number of scientific organizations, including those listed below, have worked with the Office of Government Ethics, the White House Office of Science and Technology Policy, and the Office of Personnel Management to bring about a policy change that – as you noted in your letter to the Office of Government Ethics - would remove restrictions that act as a barrier to employees achieving professional stature in their respective fields; discourage scientists and professionals from considering Federal employment; and isolate scientists and professionals from the full exchange of knowledge and ideas necessary to stay current and participate fully as members of the greater scientific community, which in turn hampers the ability of these scientists to provide the best possible advice and service to their respective agencies.

The proposed rule, published by OGE in July 2011, represented an important step towards that goal and we were eager to see the publication of the final rule. Although the public submissions are not posted on regulations.gov, to the best of our knowledge, the rule had substantial support. Thirty two professional societies – several of them consortia representing between 3 to 160 professional societies - signed a letter of strong support and many of these organizations also submitted individual comments.

We are grateful to you for your support of this proposed rule and for recognizing that it would be beneficial both to those currently in federal service as well as to agencies seeking to recruit the best and the brightest scientists in coming years.

We were recently advised by the Office of Science and Technology Policy that they met at the end of the year with representatives of the Office of Government Ethics and with officials from the White House Office of Management and Budget to discuss the final language that will be published after re-reviewing the comments. This was very welcome news, as we have continued to look forward to seeing the publication of the final rule.

It might be helpful in bringing this matter to a successful conclusion to remind these three agencies that the Office of Personnel Management also hopes to see the final rule published in the near future.

Sincerely,

Ellen Paul
Ornithological Council

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American Association for the Advancement of Science

American Educational Research Association [American Meteorological Society](#)

[American Fisheries Society](#)

American Society of Agronomy

[American Sociological Association](#)

American Statistical Association

Crop Science Society of America

Materials Research Society

River Management

Soil Science Society of America

The Wildlife Society