

Running an Independent Science Advisory Committee

A Toolkit for Scientists to Continue the Work of Dismantled Federal Science Advisory Committees

INTRODUCTION

An important role of US federal agencies is to develop and implement effective regulations and policies regarding complex health, environmental, economic, and security risks. To be effective, federal agencies rely on advisory committees that provide scientific and technical advice in accordance with the Federal Advisory Committee Act (FACA) (US Congress 1972). These Science Advisory Committees (SACs) are a subset of Federal Advisory Committees (FACs), and they are this toolkit's primary focus. FACs may be created by Congress, federal agencies, or presidential action. FACA mandates how FACs operate, emphasizing open meetings, chartering, member composition, public involvement, and transparent reporting (Stuessy and Marchsteiner 2024).

Many SACs were sidelined during the first Trump administration (Reed et al. 2018). Troubling similar signs are emerging in the current administration's early days (Barbati-Dajches 2025; Ellickson 2025). Eliminating SACs means that vital expertise from our country's best scientists—in academia, state and local government, industry, and nonprofits—is not informing solutions to complex societal challenges (Ingram et al. 2006). Policies that keep our food safe, reduce the spread of infectious diseases, and prepare communities for natural disasters must be based on the latest, most robust evidence from federal scientists collaborating with scientists independent of the government. These policies also need to be informed by diverse perspectives and real-world experiences through meaningful public participation and engagement. The health and safety of people in the United States is at stake when independent, open, participatory science is sidelined in the federal decisionmaking process.

Collective action by agency and external scientists can help to ensure that rigorous and independent science remains available to federal agencies for their consequential decisions. Using the best available science in regulatory and policy decisions is a

cornerstone of laws that ensure effective preparation for, and management of, threats to the well-being and survival of our world and its people. Regulations and policies necessarily rely on an evolving body of knowledge to ensure they are relevant and protective.

This toolkit provides scientists with preliminary information that can be used to continue the work of dismantled federal SACs. It can be augmented as warranted. It could help you achieve the following:

1. Understand key elements of SACs that ensure their rigor and independence
2. Adhere to best practices when conducting an independent SAC
3. Continue scientific progress toward assessing and addressing complex societal risks
4. Advance the role of science and public engagement in regulatory and policy decisionmaking

INDEPENDENCE, TRANSPARENCY, AND DIVERSITY ARE HALLMARKS OF FEDERAL SACs

Federal SACs play a pivotal role in shaping evidence-based policy-making by providing independent, expert advice to Congress, presidents, and executive branch government agencies. These SACs, governed by the 1972 FACA, are essential for ensuring that scientific integrity and transparency underpin decisions affecting public health, safety, and the environment (Stuessy and Marchsteiner 2024).

Hallmarks of federal SACs include:

1. **Independence.** FACA requires SAC members to have impartiality on the matters within the scope of the SAC's charter. The primary focus for SAC members is their scientific expertise relevant to the SAC scope and its review or advisory

activities. SACs must not be inappropriately influenced or dominated by special interests. The members should not have the appearance of a lack of impartiality (e.g., individuals with financial conflicts of interest cannot serve on SACs) (UCSF PRHE 2025).

- 2. Transparency and public engagement.** SAC members conduct deliberations that are open to the public for transparency and express independent advice. SACs make records available and adhere to public notice and open meeting requirements.
- 3. Expertise and diversity.** SAC members are selected to reflect a range of experience, including technical or scientific expertise and Indigenous knowledge (Philip 2015). This diverse expertise ensures that a SAC has the capabilities to address matters relevant to its charter. FACA requires that all advisory SACs be “fairly balanced in terms of the points of view represented and the functions to be performed.” Agencies have discretion to do their due diligence to ensure SACs are balanced fairly. Benefits of a well-balanced SAC include that its advice achieves maximum weight, durability, and credibility in the eyes of the public and key policymakers.

Example: President Biden’s memorandum on scientific integrity specifically noted that SAC members should “reflect the diversity of America in terms of gender, race, ethnicity, geography, and other characteristics; represent a variety of backgrounds, areas of expertise, and experiences; provide well-rounded and expert advice to agencies; and [be] selected based on their scientific and technological knowledge, skills, experience, and integrity, including prioritization of experience with evidence-based, equitable, inclusive, and participatory practices and structures for the conduct of scientific research and the communication of scientific results” (Biden 2021).

- 4. Relevance and timeliness.** Federal SACs address pressing issues, from public health crises to environmental challenges. Their ability to provide timely, evidence-based recommendations on emergent scientific and societal needs is crucial for effective governance. When a SAC is created, the best practice is to provide guidance about the intended duration of the SAC or a provision that the SAC should terminate upon completion of its mission.
- 5. Accountability and evaluation.** SACs are subject to regular evaluations to ensure they meet their objectives effectively. While this toolkit focuses on SACs, the processes and structures used to implement FACA necessitate some understanding of the different types of FACs and their respective charters and associated goals (see examples below). Accordingly, the

accountability and evaluation requirements would apply to specific FAC goals. This includes assessing FACs’ impact and their adherence to FACA’s principles. The Committee Management Secretariat of the General Services Administration (GSA) is tasked with oversight and reporting on FACA-related activities to Congress, the president, and the relevant agency head.

Example: The Environmental Protection Agency (EPA) Science Advisory Board (SAB) is not supposed to advise on policy. Although some SACs may have statutory authority to inform policy (e.g., EPA Clean Air Scientific Advisory Committee (CASAC)), there are also many committees intended to inform policy decisions that are not scientific—they are representative stakeholder committees in which members are presumed to have relevant biases. This latter type of FAC is not the focus of this toolkit.

BOX 1.

Acronyms in This Toolkit

CASAC – Clean Air Scientific Advisory Committee
DFO – Designated federal officer
EPA – Environmental Protection Agency
FACA – Federal Advisory Committee Act
GSA – General Services Administration
RGE – Regular government employee
SAB – Science advisory board
SGE – Special government employee
UCS – Union of Concerned Scientists

HOW A FEDERAL SAC WORKS

Below we describe the key elements of advisory committees. SAC success depends largely on the integrity of these elements (US Congress 1972; Morrison 2014; Slade et al. 2010; USDA 2023).

- 1. Charter.** The guiding blueprint for a FAC’s operations is the charter, developed by the sponsoring federal agency (such as the EPA or the Department of Health and Human Services). The charter defines the FAC’s mission or charge, specific duties, and general operating characteristics. The charter includes a start date, meeting frequency, and an end date. All FACs subject to FACA must submit a charter to the GSA’s Committee Management Secretariat for final review before they may begin operation. The charters for all FACs are uploaded to the FACA database (GSA 2025).

2. **Purpose and scope.** A SAC’s purpose and scope is defined by the sponsoring federal agency. Each SAC is established to provide science-based recommendations on specific topics or challenges, such as environmental protection, public health, or technological innovation.
3. **Membership.** Federal SAC members together provide a wide array of relevant knowledge for achieving the SAC’s goals. Members are typically scientists, engineers, economists, or professionals with expertise in the relevant field. They are chosen to ensure a diverse and balanced range of perspectives and knowledge. Consult Stuessy and Marchsteiner (2024) for further information about soliciting nominations, selecting and appointing members, and how the SAC’s balance is documented via a “determination” memo. FACA allows three broad categories of FAC members: regular government employees (RGE), special government employees (SGE), and representatives. SGEs are considered part-time federal employees; they serve on a FAC fewer than 130 days per year and are typically asked to serve based on subject matter expertise relevant to the FAC. Both the RGEs and SGEs require annual ethics training. SGEs fill out financial disclosure reports. SACs typically have RGEs and SGEs. Some statutes may require representatives be included in a SAC. Representatives serve to represent specific interest groups and are expected to convey those perspectives. They therefore *generally* are not covered by conflict of interest laws, save exceptions such as that FAC funding cannot flow to representatives’ family members or companies owned by a representative.
4. **Deliberation and recommendations.** Federal SAC members review scientific data, peer-reviewed journal articles, and relevant technical or Indigenous knowledge sources (Philip 2015). Deliberations occur in publicly accessible forums (except for national security reasons). SACs base their recommendations on evidence and reasoned expert judgment and must deliberate in public. Some SACs may advise on policy-relevant best-available science to inform policies, regulations, and other programs, but they generally do not advise on policy unless such advisement is specified by a relevant statute and incorporated in the SAC charter. To help ensure transparency and accountability in the federal government’s decision processes, the SAC makes all written public comments and a list of oral commenters available to the public.
5. **Ethics, integrity, and oversight.** Every FAC has a full-time career staffer from the lead agency, known as the Designated Federal Official (DFO), who manages adherence to ethical guidelines regarding impartiality, transparency, and accountability. FAC meetings are required to be open to the public, and the public can file written statements and/or provide

oral testimony during meetings in accordance with the agency’s guidelines. Members are required to disclose any conflicts of interest, and efforts are made to maintain the integrity of the advisory process. Federal agencies oversee the FACs and ensure they comply with laws such as the Administration Procedures Act (US Congress 1946; US Congress 1972). For example, FACs must not be inappropriately influenced by the appointing authority or by special interests.

6. **Time period.** There are several practical ways a federal SAC can terminate. Usually, the charter designates an end date or opportunity to review completion of the charge, providing a decision point for the agency to renew or sunset the committee. Alternatively, a government action directed by the president or agency secretary or administrator may disband the committee before completion. Scheduled meetings under the charter may be canceled or funding for the committee may end.

BOX 2.

Relevant Definitions

Best available science means “the most reliable, valid, up-to-date, and relevant empirical knowledge” (Phillips 2025).

Conflict of interest means a person or organization has financial interests such that serving one interest could work against another and potentially adversely affect a third party (UCSF PRHE 2025).

Scientific integrity is “the adherence to professional practices, ethical behavior, and the principles of honesty and objectivity when conducting, managing, using the results of, and communicating about science and scientific activities. Inclusivity, transparency, and protection from inappropriate influence are hallmarks of scientific integrity” (Prabhakar 2023).

WHY IT IS IMPORTANT TO CONTINUE INDEPENDENT SCIENCE ADVICE IN THE ABSENCE OF FEDERAL LEADERSHIP

What’s at Risk If We Eliminate SACs?

Eliminating (or prematurely terminating) federal SACs may weaken the effectiveness and durability of government decisions in addition to diminishing public trust. SACs often serve as a bridge between the scientific community and the public, particularly on complex environmental, health, and security problems.

SACs provide robust scientific insights to policymakers. They also identify emerging challenges and opportunities in science and technology, highlighting pathways to progress on critical issues. Without these insights, federal, Tribal, state, or local governments and community leaders may lack evidence-based guidance, potentially leading to less effective or even harmful policies. Decisions may also be more susceptible to political or corporate influence.

Trump Administration Attacks on Science Advice Are Well Documented

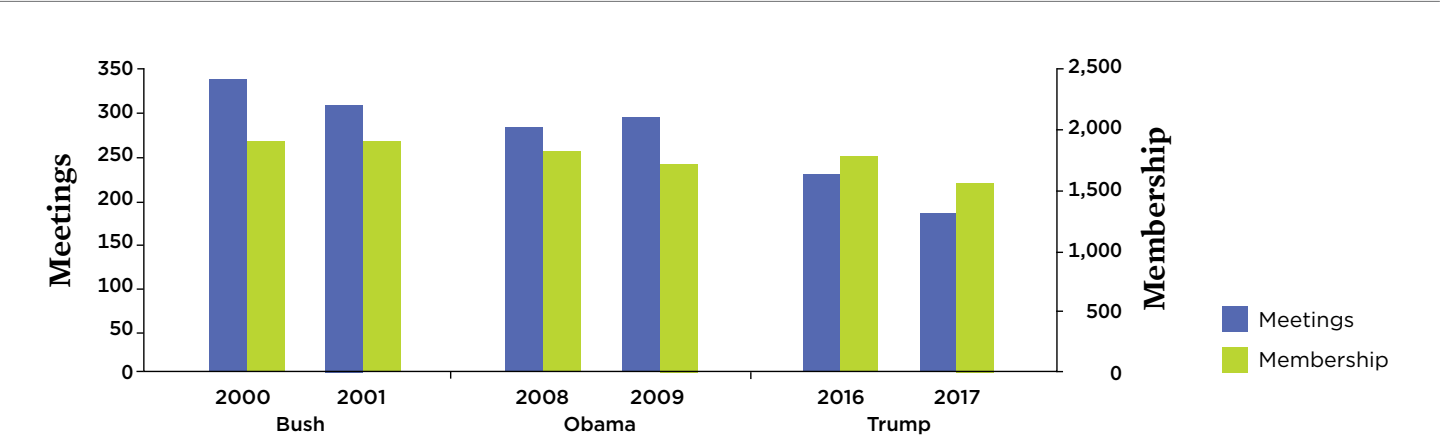
During the first Trump administration, researchers documented multiple ways in which the science advice needed by federal agencies was sidelined (Reed et al. 2018). For instance, total SAC meetings and membership decreased during the Obama-to-Trump (2016 to 2017) presidential transition at a rate that outpaced the prior Bush-to-Obama (2008 to 2009) or Clinton-to-G.W. Bush (2000 to 2001) transitions (see Figure 1). In 2017, nearly 62 percent of the 73 SACs analyzed (across 24 departments, agencies, and subagencies) met less frequently than their charters required. In another example, the Department of Energy failed to fill the membership of the longstanding Secretary of Energy Advisory Board despite the importance of its advice on issues such as the future of energy technologies and the effectiveness of the nation’s 17 national laboratories. And, at a time when the Department of the Interior was making important land management decisions, membership on its more than 200 FACs was frozen, including on nine SACs.

In the early days of the second Trump administration, we are seeing a similar pattern of neglect and sidelining of science. During the Biden-to-Trump transition (2024 to 2025), the majority of FACs terminated (22 of 29) occurred in FY2025 under the incoming Trump administration (GSA 2025).

Benefits of Maintaining Independent Science Advice

Despite the current Trump administration’s dismantling of various committees, scientists and their organizations still can collaborate to form independent SACs with similar scope. An independent SAC can provide valuable, unbiased insights into scientific evidence and policy formation and safeguard against distortions of research in federal policymaking. These independent SACs often include members who have served before and add those who can fill key knowledge gaps without conflicts of interest (Barbati-Dajches 2025). These scientists and technical specialists become an important resource for providing decision-makers with the most up-to-date, robust scientific advice. They help the public see how scientific deliberations are held among experts who have diverse perspectives and how they build consensus to drive recommendations to the federal government in support of sound, evidence-based decisions. SAC meetings give the public the chance to provide input for consideration and also to have its input documented in the public record. Committee meetings also provide an opportunity to highlight where the government is failing to use scientific evidence in its decision-making and thus failing to protect the public interest.

FIGURE 1. Total SAC Meetings and Membership during Presidential Transition Years



Science advisory committee meetings and membership have decreased in number in 2017 compared with 2016, slowing committee work that helps agencies decide on emerging scientific and technical issues. While less activity is common in the first year of a new administration, the differences between 2016 and 2017 are greater than those of the Clinton-to-G.W. Bush and Bush-to-Obama transitions. This figure was originally published in Reed et al. 2018.

SOURCE: GSA 2017.

Example: For a real-world illustration, take a look at the Independent Particulate Matter Review Panel. Composed of scientists and experts dismissed by the first Trump administration, this SAC convened and began operating independent of federal support. The Union of Concerned Scientists (UCS) helped with logistical support for SAC members to meet face to face and to share publicly the recommendations the committee sent to the EPA (Frey 2019; Goldman 2019).

HELPFUL QUESTIONS TO CONSIDER WHEN DECIDING IF AND HOW TO CONVENE AN INDEPENDENT SAC

Deciding whether it makes sense to convene an independent SAC to continue the work of a disbanded federal SAC may seem a complicated task. Here are several key questions that can help guide how to approach formation and implementation of an independent SAC.

1. **Did the federal SAC have a statutory mandate and/or clear charter** that could be continued in the absence of federal leadership? The original charter will provide guidance on any statutory authority, scope of work, meeting frequency, and anticipated products. The research questions may need to be clarified, or the meeting processes simplified to ensure the work can be continued within the new context. For example, if the federal SAC was dependent on federal officers for charge questions, document drafts for review, or other prompts, you may need to consider how to adopt such tasks without direct federal input.
2. **Is there a clear benefit** to developing the science advice and public forum in the absence of federal leadership? Important reasons for continuing the federal SAC's work of evaluating evidence and developing recommendations include:
 - a. Countering misinformation in the public narrative
 - b. Preparing science advice so it is ready to hand to future federal decisionmakers when the opportunity arises
 - c. Making the science advice available to existing decisionmakers at other levels of government
 - d. Creating an opportunity for meaningful public input on critical scientific topics and providing public accountability for administration actions
 - e. Building public trust in science
 - f. Providing a vehicle for continuity of scientific progress and consensus building
3. **How will you allow for open deliberation** and building consensus that can preserve the credibility of participating SAC members? Serving on a federal SAC has historically been viewed by scientists as an honor and an opportunity to use their expertise to support the public good. As the current Trump administration threatens to remove federal funding from academic institutions, among other actions, it is imperative that institutions provide certainty and support for their staff and students to continue their important work without political interference. SAC members should work with their home institutions, companies, or organizations to serve as champions of this effort.
4. **Is there interest and capacity** for the SAC work? Possible scenarios for continuing a SAC may include the following. First, a dismantled federal SAC may self-organize to continue as an independent SAC. Second, when the federal government continues an existing federal SAC with new committee members, an independent SAC with its own set of members (who may or may not have prior service on the relevant SAC) may be worthwhile. Third, there may be new topics for which a SAC is warranted but the federal government is not convening such a SAC. To ensure the work proceeds in a timely and organized manner, someone will need to take the lead in reconvening the SAC members or soliciting new members (in a manner that mirrors past practice) and delegating key tasks. Consider added capacity and budget that could be gained from collaborating with nonprofit organizations, academic institutions, or scientific societies that may be able to provide administrative and logistical support.
5. **Is there access to someone knowledgeable about FACA** to help ensure a transparent, balanced committee that works according to the guidelines? Ideally, a person with DFO experience could bring their expertise to support the new work and facilitate the SAC in partnership with the current committee chair. Or perhaps there are former federal employees who previously served in this role and are interested and available to support the work.
6. **How will you communicate to key stakeholders** about the existence of the SAC and its progress? Raising awareness among affected and interested parties is key to ensuring accountability and building public trust in science. Developing a communications plan that uses multiple channels can support a broad reach for the effort. This plan should include public meetings, online platforms, and social and traditional media outreach.

7. **What are the key logistical considerations?** Planning ahead will help to ensure smooth logistics on everything from organizing SAC members and soliciting new membership to delivering a polished final recommendation letter or report. For instance, is it possible to establish a physical meeting venue or are virtual meeting mechanisms available? Are there existing templates that can be used for secure document transfer and are storage options available? Is there an existing communications plan that can be adapted?
8. **What product will the SAC generate and how will it share it?** Products could include a report detailing methods, findings, and recommendations, and/or a letter to decision-makers or another technical document. The SAC can share information by sending it to the agency leadership official who would have received such information from a federal SAC. The SAC can also submit information to a docket if the agency has one relevant to the topic. Submission to a docket is especially important, where possible, to establish an administrative record that can be accessed in later judicial proceedings. Communicating publicly about the SAC's process and progress will be valuable also to ensure transparency and build trust. Broadly sharing lessons learned may also encourage other scientists to advance additional committee work.

LEVERAGE YOUR EXPERTISE AS A SCIENTIST TO INFORM REGULATORY AND POLICY DECISIONS

As a scientist, you can put your expertise to work. Collaborating with other experts to advocate for science-based decisions and supporting independent SACs is more critical than ever when the federal government is sidelining science.

Collective action by scientists can help to ensure that rigorous and independent science remains available to federal agencies for effective policy decisions about complicated health, environmental, economic, and security risks.

1. **Track the federal SACs you care about.** Speak out and share in the scientific community or more broadly when you notice a SAC is disbanded or for all practical purposes is barely meeting charter goals. The FACA Database is a good place to start looking for information about FACs, including who the chair and members are and contact information (GSA 2025). Communicate about the consequences of that loss of advice by learning about the deliverables in progress and explaining how decisions will be less informed without that expert advice.
2. **Advocate for science-based decisions.** Engage with other experts in your discipline and work with your scientific society to ensure science advice can continue as best as possible. Advocate for science advice to federal agencies and defend against legislative or executive attempts to dismantle key committees. Reach out to your congressional representatives and offer to serve as a resource on issues related to your expertise. Promote public education and community action.
3. **Support an independent SAC.** Even if you are not a member, you can still support the work of a SAC and get engaged. Attend meetings and gather and submit evidence and comments. Provide expert testimony. Peer review the draft recommendations report. To find a committee of interest, consult the FACA Database maintained by the GSA (GSA 2025).
4. **Run or join an independent SAC.** Form an independent SAC to make available expert advice on emerging issues. If you were on a federal SAC that has been disbanded by the administration, continue your work by collaborating with the other SAC members. If you are a former government employee with knowledge of FACA and how to run a SAC, consider volunteering to support an independent SAC in need of facilitation, outreach and engagement, administrative, or other logistical support.

ADDITIONAL RESOURCES

- **Join the [UCS Science Network](#),** through which members can apply their expertise to science-related issues with the goal of improving lives and outcomes for all (UCS n.d. e). Are you a federal scientist, a grant recipient, a colleague, or someone who has relied on federal research and expertise? Share your story to help illustrate what we gain from—and what we would lose without—federal agency research and funding (UCS n.d. d).
- **Check the [UCS Resources for Federal Scientists webpage](#).** This includes information that will help you know your rights, protect yourself against attacks, document attacks on science, and build a community for resilience (UCS n.d. b).

- **Learn more about the [Save Science, Save Lives campaign](#).** This UCS campaign stands up for science and the scientists who keep us safe (UCS n.d. c).
- **Build skills.** Whether you are an experienced scientist-advocate or an early-career scientist taking your first steps into advocacy, the Science Network can help you increase your impact. If you wish to understand more about how to address the conflicts of interest prohibitions of SACs, attend a webinar about this toolkit or consult this citation: (UCS n.d. a). Additional toolkits, leadership development resources, how-to webinars, and other guidance is available on the UCS website (UCS n.d. a).

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