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The Honorable Micheal Kratsios
Director
White House Office of Science and Technology
1650 Pennsylvania Ave, NW
Washington, D.C., 20504

Dear Director Kratsios,
President Trump's recent Executive Order (*Restoring Gold Standard Science*[1]) directs federal agencies to revert to the version of their scientific integrity (SI) policy that was in effect on January 19th, 2021—in many cases weakening or removing these policies as a result. It also requested the White House Office of Science and Technology Policy (OSTP) to create new SI policy guidance for federal agencies. We, the undersigned staff/staffers at the Union of Concerned Scientists, urge you to continue the implementation and protection of Scientific Integrity (SI) in the federal government. It is also critical that, as the Director of OSTP, you create this guidance in line with SI best practices[2][3][4].

Science has played a critical role in making sure federal agencies can improve people's health and well-being. People rely on access to clean air and water, healthy food, safe medicine, uncontaminated products and materials, and early warnings and protection from extreme weather. They will not get such access if political or corporate interests interfere with data collection, communication of results, or scientific research funding. To continue protecting people and extending the benefits of science to everyone in our nation, the federal government must support and rely on independent science for the creation of good policy. Without strong federal science, people will suffer, especially historically marginalized communities[5].

During the first Trump administration, there were over 200 attacks on science[6], and this administration's anti-science actions[7] demonstrate that political officials continue to undermine science. Rolling back scientific integrity policies increases the risk of further political interference.

We have specific concerns about this EO and how it may impact the extent to which the best available science[8] can be used to inform federal policy.

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[1] Trump, Donald J. 2025. "Restoring Gold Standard Science." Presidential Executive Order, May 23rd. Washington, DC: The White House. https://www.whitehouse.gov/presidential-actions/2025/05/restoring-gold-standard-science/
[2] MacKinney, Taryn, Carter, Jacob, Reed, Genna, Goldman, Gretchen, and Desikan, Anita. August 25th, 2020. *A Roadmap for Science in Decisionmaking.* Cambridge, MA: Union of Concerned Scientists. https://www.ucs.org/resources/roadmap-science-decisionmaking
[3] Scientific Integrity Framework Interagency Working Group. January 2023. A Framework for Federal Scientific Integrity Policy and Practice. Washington, DC: US National Science and Technology Council.
[4] White House Office of Science and Technology Policy (OSTP). May 2023. Scientific Integrity Policy. Washington, DC: US OSTP.
[5] Union of Concerned Scientists. September 2nd, 2016. *Science and Racial Equity*. Cambridge, MA. https://www.ucsusa.org/resources/science-and-racial-equity
[6] Phartiyal, P. 2025. "The Trump Administration Playbook Likely to Target Science and Scientists – We're Ready to Fight Back." *The Equation* (blog). January 17th. https://blog.ucsusa.org/pallavi-phartiyal/the-trump-administration-playbook-likely-to-target-science-and-scientists-were-ready-to-fight-back/
[7] Union of Concerned Scientists. March 29th, 2025. "Attacks on Science." https://www.ucs.org/resources/attacks-on-science
[8] Phillips, C. 2025. "What Does the "Best Available Science" Mean?" *The Equation* (blog). January 15th. https://blog.ucsusa.org/carly-phillips/what-does-best-available-science-mean/

First, we are concerned about the directive to give politically elected officials oversight of scientific integrity policies and violations. This would put political officials in charge of a process that should be protected from politicization.

Second, the EO instructs agencies to make publicly available the data, analyses, and conclusions of studies used to inform policy. This is a disturbing echo of the Transparency in Pivotal Science Rule, an Environmental Protection Agency regulation that was vacated after being challenged in court[9]. This rule risked the exclusion of studies from policy development that included sensitive or confidential information[10], like public health studies, on the impacts of hazardous materials on children[11]. It would give political officials a subjective standard to exclude scientific evidence that might run counter to their policy goals.

Third, there is no emphasis on protecting the independence of science in the EO. Scientific integrity policies were created with the explicit goal of preventing political interference in science[12]. Not prioritizing the independence of science could make it easier for political and corporate actors to interfere in the scientific process.

Science informs strong public policy that protects natural resources and the health, welfare and safety of Americans. If agencies respond to the EO by adopting weak SI policies, it will pave the way for polluters and special interest industries to face no consequences or repercussions when they put profits ahead of people's health and the need to sustain natural resources for future generations.

Strong SI policies are clear, enforceable, and overseen by non-political staff. We ask that the scientific integrity guidance you create for agency leadership do the following:

- Prioritize the best available science[13] to inform agency decision-making and policies;
- Ensure federal scientists, and those supported by federal funding, conduct work without political interference, harassment, or intimidation;
- Encourage accurate external communication of scientific research and results without obstruction or fear of reprisal;
- Emphasize the importance of protecting personally identifiable information (including information that could be triangulated with other publicly available information to identify a person) and confidential business information when deciding whether to make datasets publicly available, and specify that a dataset's non-public availability is not a reason to disregard the findings of studies that rely on the dataset;
- Maintain transparency about potential conflicts of interest and abuses of science; and
- Provide adequate resources to scientists to conduct research and effectively carry out their agencies' missions.

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[9] Ellickson, K. 2025. "Fool's Gold: The Trump Administration's New Executive Order is a Bad-Faith Attack on Science." *The Equation* (blog). June 5th. https://blog.ucs.org/kellickson/fools-gold-the-trump-administrations-new-executive-order-is-a-bad-faith-attack-on-science/

[10] Goldman, Gretchen and Barbati-Dajches, Jules. 2025. "The US Executive Order establishing "Gold Standard Science" Does Anything But." *BMJ,* 389, 1-2. http://doi.org/10.1136/bmj.r1173

[11] Ellickson, K. 2025. "Fool's Gold: The Trump Administration's New Executive Order is a Bad-Faith Attack on Science." *The Equation* (blog). June 5th. https://blog.ucs.org/kellickson/fools-gold-the-trump-administrations-new-executive-order-is-a-bad-faith-attack-on-science/

[12] Williams, C. 2024. "What is Scientific Integrity-and How Does it Keep All of Us Safe?" *The Equation* (blog). December 9th. https://blog.ucs.org/chris-williams/what-is-scientific-integrity-and-how-does-it-keep-all-of-us-safe/

[13] Phillips, C. 2025. "What Does the "Best Available Science" Mean?" *The Equation* (blog). January 15th. https://blog.ucsusa.org/carly-phillips/what-does-best-available-science-mean/

Prioritizing the use of the best available science in federal agencies can help prevent future climate disasters[14], improve public health[15], and protect the health of the planet[16]. Actions that protect independent science can help protect economic[1718], public, and environmental health.

Again, we urge agency leadership and OSTP guidance to continue the implementation of SI protections. Agency scientists should be able to rely on the best available science and scientific practices and give political decision-makers the best information possible, for the benefit of our nation's health and well-being. Thank you for your time and we look forward to your response on this matter.

Sincerely,

Union of Concerned Scientists

[14] Cleetus, R. 2024. "What the US Needs from a New NOAA Administrator (Science, Please)." *The Equation* (blog). December 10th. https://blog.ucsusa.org/rachel-cleetus/what-the-us-needs-from-new-noaa-administrator-science-please/

[15] Ellickson, K. 2024. "Protecting Public Health is Complicated. But Science Can Help, and the Time is Now." *The Equation* (blog). September 30th. https://blog.ucsusa.org/kellickson/protecting-public-health-is-complicated-but-science-can-help-and-the-time-is-now/

[16] Woods, Stacy. 2024. *Wetlands in Peril: How Industrial Agriculture Damages Critical Ecosystems, Increasing Flood Risk in the Upper Midwest*. Cambridge, MA: Union of Concerned Scientists. https://www.ucsusa.org/resources/wetlands-peril

[17] Rosenberg, A. A., Branscomb, L. M., Eady, V. Frumhoff, P. C. Goldman, G. T., Halpern, M., Kimmell, K., Kothari, Y., Kramer, L. D., Lane, N. F., McCarthy, J. J., Phartiyal, P., Rest, K., Sims, R., and Wexler, C. 2015. "Congress's Attacks on Science-Based Rules." *Science, 348*(6238), 964-966. https://doi.org/10.1126/science.aab2939

[18] United for Medical Research. 2025. *NIH's Role in Sustaining the U.S. Economy: 2025 Update.* Washington, DC. https://www.unitedformedicalresearch.org/annual-economic-report/