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My name is Miranda Yaver. I am a political scientist and health policy professor at the University of Pittsburgh, prior to which I was an Assistant Professor of Political Science at Wheaton College in Massachusetts. I received my Ph.D. in Political Science (American Politics) at Columbia University, during which time I focused my studies on American bureaucracy.

In light of this, I am writing to express my strongest opposition to the “Improving Performance, Accountability and Responsiveness in the Civil Service” rule proposed by the Office of Personnel Management. Politicizing the civil service would be dangerous to this country, undercutting substantive policy expertise where we need it most, and instead returning America to the spoils (or patronage) system that we developed the civil service to move away from.

What did this spoils system look like? People received government posts because of partisan loyalty rather than any semblance of merit. What’s more, there was corruption and abuse, and prioritizing the hiring of inept loyalists bred inefficiencies in governance.

There’s a famous adage that people campaign in poetry and govern in prose. The development of this prose requires substantial policy sophistication to take on issues of complex economic, labor, health, environmental, and other policies. That’s where the civil service comes in, with merit-based hiring, competitive exams, and reduced political influence so that policy substance and expertise can be in the metaphorical driver’s seat when taking on complex policy in a large, complex society.

What is the level of benzene that can be in the water without being toxic? “Big Balls” doesn’t know this, but a civil servant would.

This policy expertise has not gone unnoticed by the other branches. Up until the 2024 Supreme Court holding of *Loper Bright v. Raimondo*, the Supreme Court had explicitly had a policy under *Chevron v. NRDC* (1984) that it would defer to agencies’ reasonable interpretations of congressional delegations that were left vague (as is often the case). The reason for this judicial deference? Agencies’ expertise. Unlike judges (comprised of lawyers) and members of Congress (comprised mainly of lawyers and businesspeople, though with some policy staffers), agencies are (for now) staffed with expert civil servants, typically serving across multiple administrations of both political parties, developing a mastery of complex subject areas on which Congress might delegate implementation authority. Though Chief Justice Roberts just threw cold water on this theory, its embrace for forty years (as well as the backlash in legal and many political circles) nevertheless highlights the widespread support for a protected, expert civil service that has the latitude to carry into effect the laws within their purview.

The reinstatement of Schedule F would convert 50,000 or more career civil servants into political appointees serving at the pleasure of the president and his minions. Such a shift would be deeply harmful across all policy domains, undercutting any notion of agency expertise we had previously assumed.

And unfortunately, these harms are no longer just speculative. Over the past 3.5 months, we have seen the dangers of inept appointments, especially in the “Department of Governmental

Efficiency,” which has not only taken an axe to critical programs but has sown chaos through its striking lack of knowledge about the who, what, and why of these programs. One day people are getting fired. The next day they’re being asked to return to work, but contact information is difficult to track down. They want to save X number of federal dollars and will cut any program to get it, because they lack the substantive background on the importance of so many of these critical programs. They have sought to take programs like WIC (Women, Infants, and Children), which is overseen by the US Department of Agriculture, and have it absorbed into the Department of Health and Human Services, even though such a move defies logic and will consequently destabilize a health program on which about seven million rely for crucial benefits.

One key example of inexpert governance has come up in the context of mental health care for veterans. Not only were there dramatic cuts to the VA, including to its suicide crisis line on which veterans in mental health crises rely, but coupling this with the enforced return-to-work order has led some people to analogize the delivery of teletherapy to veterans to being in a “call center,” completely devoid of critical patient privacy (HIPAA!) and likely leading to resignations. Those actually attuned to program implementation would not make these mistakes for this important and vulnerable population.

Now let’s look more broadly at health policy, the domain in which I conduct research and teach at the undergraduate and graduate levels. Contrary to President Trump’s assertion that “no one knew health care was so complicated,” those of us working in health policy know well its many complexities, whether thinking about the intricacies of health insurance or issues of food and drug regulation at a time that wellness influencers are being prioritized in administration hiring over qualified physicians who embrace sound science. Under Schedule F, we might see deregulation concerning subjects like raw milk, the consumption of which can be very dangerous and cause serious illnesses, especially for vulnerable populations, but which some (including Secretary of Health and Human Services Robert F. Kennedy Jr.) have spread misinformation about in effort to promote its consumption. Under Schedule F, rather than drawing on scientific experts who would highlight the profound health risks, America would see the hiring of “yes men” to advance junk science that will put people’s health at risk.

We may also see the politicization of drug approvals through the Food and Drug Administration, likewise putting at risk the health of the many Americans reliant on drugs whose safety may become compromised in the interest of partisan victories surrounding expeditious drug rollouts. This is all to say, we may see the diminishing of scientific expertise in critical agencies like the FDA, where expertise is paramount. Related, we will see even in these vital areas of health and safety a prioritization of short-term political wins, perhaps timed around elections, rather than prioritizing the slower and methodical approach that defines sound science.

Most Americans will not read the studies underlying new drugs. But context matters, and it will be increasingly hard for people to make the right decisions for their own health and safety.

The reinstatement of Schedule F is both bad politics and bad policy. It is bad politics because it prioritizes short-term political wins over expertise, fueling political cronyism. What’s more, partisan tides tend to shift over time, and when the pendulum swings, conservatives may regret having undermined career civil servants in favor of politicization. It is bad for policy because

inexpert policy will not just lead to destabilization (which is bad enough) – it will literally put countless millions of Americans lives in jeopardy.

I strongly advise that Schedule F not be reinstated, and that this proposed rule be rescinded.

Sincerely,

*Miranda Yaver*

Dr. Miranda Yaver