

June 7, 2025

Charles Ezell, Acting Director
U.S. Office of Personnel Management
1900 E Street NW
Washington, D.C. 20415

Re: RIN 3206-AO80; Improving Performance, Accountability and Responsiveness in the Civil Service

Acting Director Ezell,

The Freedom Foundation (“Foundation”) is a nonprofit organization organized under 26 U.S.C. § 501(c)(3). Founded in 1991 in Olympia, Wash., the Foundation now operates nationwide with staff and offices around the country, with a mission to advance the principles of individual liberty, free enterprise and limited, accountable government. Specifically, the Foundation has devoted much of its attention to supporting reforms to make labor unions representing government employees more accountable to their members and taxpayers.

Through its interactions with tens of thousands of union-represented government employees, the Foundation has developed considerable expertise on the operations and activities of labor unions and has interfaced extensively with the public officials at every level of government who are responsible for overseeing, enforcing and adjudicating such matters. The Foundation’s work in this area regularly includes legislative advocacy, public interest litigation, investigative research and the filing of administrative complaints with government agencies tasked with investigating unlawful activity or other misconduct by labor unions. In these contexts, the Foundation has both documented and experienced firsthand the capacity of federal government employees to influence agency policies and operations in ways that subvert the will of the American people as expressed through the leaders they democratically elect and even exceed or contradict their statutory authority.

Led by these experiences, the Foundation strongly supports the proposed regulation by the Office of Personnel Management (OPM) to increase federal employee accountability to elected officials and ultimately the American people by establishing a Schedule Policy/Career category for career employees in policy-influencing positions.

I. Case Study: Career Employee Policy Resistance at the NLRB

Background

When President Joe Biden took the oath of office on January 20, 2021, one of his administration’s first acts—if not its very first act—was to fire the General Counsel of the National Labor Relations

Board (NLRB), Peter Robb, who had been appointed to the position by Biden's predecessor, President Donald Trump.¹

Robb's firing came 10 months before his appointment was set to expire and marked the first time in history that a president had replaced the NLRB General Counsel prior to the end of his or her term.² The National Labor Relations Act (NLRA) specifies that the NLRB General Counsel "shall be appointed by the President, by and with the advice and consent of the Senate, for a term of four years" and does not envision or discuss its removal.³

Nevertheless, at 12:23 p.m. Eastern Standard Time on inauguration day in 2021, just minutes after President Biden was sworn into office, his staff emailed Robb demanding that he resign or face termination by 5:00 p.m.⁴ Robb declined and was terminated.⁵

Shortly thereafter, President Biden named Peter Ohr, then the regional director of the NLRB's Region 13 office in Chicago and an actual and self-described "career employee of the NLRB," as the agency's Acting General Counsel.⁶

Career NLRB Employees' Policy-Influencing Role

Though appointed by the General Counsel, NLRB regional directors are career civil service employees—not political appointees—and, like Ohr, are customarily selected from within the ranks of the NLRB's longtime career staff.⁷

Despite their career status, the agency's regional directors and their staff exercise considerable discretion in steering the NLRB's policies and operations, having broad authority to conduct union representation elections and investigate unfair labor practice complaints. With the fate of most labor disputes determined exclusively by the agency's regional offices, some NLRB stakeholders have described these career federal employees as having "their own fiefdoms" that produce inconsistent policy outcomes driven by their own personal ideologies, considered by many to be unfairly biased towards unions.⁸

In fact, career NLRB employees serving as regional directors have landed in policy-influencing roles by definition. According to OPM's guide to the Senior Executive Service (SES)—of which

¹ Kullgren, Ian and Josh Eidelson. "Biden Fires NLRB General Counsel After He Refuses to Resign (3)." *Bloomberg Law*. January 20, 2021. <https://news.bloomberglaw.com/daily-labor-report/biden-moves-to-oust-top-labor-board-attorney-robb>

² *Id.*

³ 29 U.S.C. § 153(d)

⁴ Copies of the emails between Peter Robb and President Biden's Office of Presidential Personnel are available here: <https://www.freedomfoundation.com/wp-content/uploads/2021/06/NLRB-2021-000457-final-records-Robb-termination.pdf>

⁵ *Id.*

⁶ NLRB Office of Public Affairs. "Peter Sung Ohr Named Acting General Counsel." National Labor Relations Board. January 25, 2021. <https://www.nlr.gov/news-outreach/news-story/peter-sung-ohr-named-acting-general-counsel>

⁷ See, for example, the NLRB's historical announcements of regional directors. <https://www.nlr.gov/news-publications/news/announcements>

⁸ Noam Scheiber. "Trump Appointee Is Trying to Squelch Us, Labor Board Staff Says." *The New York Times*. January 26, 2018. <https://www.nytimes.com/2018/01/25/business/economy/labor-board.html>

the NLRB's regional directors are a part⁹—the criteria for such positions specifically includes the exercise of “important policy-making, policy-determining, or other executive functions.”¹⁰

As OPM has explained in its notice of proposed rulemaking, such language comes directly from the statutory text of the Civil Service Reform Act (CSRA) of 1978, which created the SES to house leadership positions with those functions while simultaneously limiting the number of noncareer political appointees that could fill them.¹¹ OPM correctly notes, therefore, that policy-influencing roles cannot reasonably be interpreted to be limited only to political appointees, because Congress expressly provided that policy-influencing career employees (not political appointees) make up most SES positions and used the same terms to describe career employees whose positions may be excepted from the competitive service under 5 U.S.C. § 7511(b)(2).¹²

Moreover, though SES positions are statutorily distinct from the policy-influencing career roles subject to 5 U.S.C. § 7511(b)(2) and OPM's proposed rule, common sense and evidence both point to the fact that many lower-level career employees are just as likely to shape agency policy as their career senior executives.

At the NLRB, after all, such career executives—regional directors—are typically drawn from the agency's existing regional offices. It has been well documented that previous presidential administrations have hired overtly ideological union activists into NLRB career roles,¹³ some of whom indeed go on to become regional directors.¹⁴ Given the considerable discretion known to be wielded by NLRB regional career staff in interpreting and applying policy,¹⁵ it easily follows that the desire and ability to influence agency policy does not begin the moment an employee is named a regional director.

Rather, as the Foundation's probe into the NLRB shows, such policy-influencing characteristics are deep-rooted and prevalent among both the agency's regular staff and its regional directors who, as longtime career employees of the NLRB themselves, have simply carried their ideological biases forward into senior executive roles.

⁹ Senior Executive Service Positions That Were Career Reserved During Calendar Year 2024. 90 Fed. Reg. 21552 (May 20, 2025). <https://www.federalregister.gov/documents/2025/05/20/2025-08853/senior-executive-service-positions-that-were-career-reserved-during-calendar-year-2024>

¹⁰ United States Office of Personnel Management. “Guide to the Senior Executive Service.” March 2017. <https://www.opm.gov/policy-data-oversight/senior-executive-service/reference-materials/guidesessservices.pdf>

¹¹ Improving Performance, Accountability and Responsiveness in the Civil Service. FR Doc. 2025-06904 (April 23, 2025). <https://www.regulations.gov/document/OPM-2025-0004-0001>

¹² *Id.*

¹³ James Sherk. “Tales From the Swamp: How Federal Bureaucrats Resisted President Trump.” America First Policy Institute. January 8, 2025. <https://www.americafirstpolicy.com/issues/20222702-federal-bureaucrats-resisted-president-trump>

¹⁴ See, as just one example, the NLRB's announcement naming Kimberly E. Andrews, an NLRB career employee and former union leader and organizer for the AFL-CIO, as a regional director in 2023. <https://www.nlr.gov/news-outreach/news-story/kimberly-e-andrews-named-regional-director-of-region-4-philadelphia>

¹⁵ For example, a 2017 study of NLRB regional office policy outcomes by political science professors at the University of North Carolina at Chapel Hill and California State University, Chico, explains, “... regional staff have discretion in determining the merit of complaints. The decentralized structure of the NLRB's regional offices, combined with the clientele discretion to file cases and staff discretion to find merit, provides opportunities for variation by filing office.” The study also concluded that such discretion by regional staff in applying NLRB policy resulted in “some regions that are pro-labor leaning... and others which were in the direction of the employer.”

Hoyman, M.M., Schmidt, D., & McCall, J. (2017). Is there policy delivery variation across the administrative regions of the National Labor Relations Board? *The University of North Carolina at Chapel Hill*. <https://michelehoymman.web.unc.edu/wp-content/uploads/sites/8395/2017/02/Hoyman-Schmidt-and-McCall-2008.pdf>

Records Show Widespread “Resistance” By Career NLRB Employees

Beyond the political controversy stirred up by Robb’s inauguration day firing, internal NLRB emails subsequently obtained by the Foundation under the Freedom of Information Act (FOIA) uncovered an even more extraordinary truth about the circumstances surrounding his tenure and sudden removal—namely, the role of NLRB career employees in “resisting” Robb’s leadership throughout the first Trump administration and simultaneously working to advance their own view of the agency’s mission that undermined that of the democratically elected president.¹⁶

Emails between current and former NLRB employees and Biden’s interim pick to replace Robb, Peter Ohr, revealed stunning admissions of these career bureaucrats’ efforts to resist the lawful policy directives set for the agency by President Trump’s political appointee.

On Jan. 26, 2021, Allen Binstock, a retired regional director and another former longtime NLRB career employee,¹⁷ emailed a note to Ohr congratulating him on his appointment to Acting General Counsel and trashing Robb:

“Congratulations on your appointment as Acting GC. For my money, I’d love to see you in that position permanently. It is such sweet justice to see Robb kicked out... as we both know, Robb did what he could to hollow out the Agency and ruin it. It was only because of the brave resistance of people like you that he did not do more damage. So I celebrated when Robb was shown the door. But now I’m elated that you are in charge of the GC’s office.”¹⁸

(Emphasis added).

Binstock’s note is extraordinary for several reasons. First, it’s a candid acknowledgement of career employee policy resistance within the NLRB.

Second, it suggests that Ohr is not the only NLRB employee to resist Robb’s leadership. In fact, it’s clear from Binstock’s tone that he assumes this is commonly understood. Not only does Binstock praise Ohr for resisting Robb’s policies, but he also implies that this is a shared value held by many at the NLRB. Whether it be he, Ohr, or any number of “people like [them],” the retired Binstock is clearly thankful that the NLRB is staffed with people who can be counted on to thwart the policy agenda of a presidential administration they disagree with.

Finally, it acknowledges that this resistance had a tangible effect on the NLRB’s policies during Robb’s tenure. Binstock, a retired regional director who was undoubtedly familiar with the agency’s operations, affirmed in his email that were it not for the “resistance” mounted by Ohr and other career employees within the NLRB, the Trump-appointed Robb surely would have been able

¹⁶ Maxford Nelsen. “Records shed light on Biden’s day-one firing of Trump’s NLRB general counsel.” Freedom Foundation. May 17, 2021. <https://www.freedomfoundation.com/labor/records-shed-light-on-bidens-day-one-firing-of-trumps-nlr-general-counsel/>

¹⁷ NLRB Office of Public Affairs. “Allen Binstock Named Regional Director for NLRB’s Cleveland Office.” National Labor Relations Board. March 24, 2014. <https://www.nlr.gov/news-outreach/news-story/allen-binstock-named-regional-director-for-nlrbs-cleveland-office>

¹⁸ Copies of the emails between Peter Ohr and Allen Binstock are available here: <https://www.freedomfoundation.com/wp-content/uploads/2021/06/NLRB-2021-000457-final-records-Binstock.pdf>

to accomplish more of the policy goals he set out for the agency (in Binstock’s words, “do more damage”).

Proving Binstock’s point, other emails obtained by the Foundation in the wake of Robb’s firing shed light on how many career staff at the NLRB view their roles not as implementing the policy agenda of the public as expressed through the duly elected executive, but as advancing a particular ideological view of the agency’s mission centered around promoting unionization, and how, during the first Trump administration, their efforts to do so directly conflicted with their appointed leader’s policies and priorities.

One NLRB attorney, in a congratulatory email sent to Ohr, described his appointment as a “REFRESHING change!!!”¹⁹ Another wrote that Ohr’s appointment was a “huge sigh of relief” for the agency’s field staff.²⁰ Several other NLRB employees expressed similar opposition to Robb’s leadership of the agency, writing that his removal and replacement with Ohr was “some justice,” gave NLRB employees “a spark of hope,” would allow for “the recovery of our country” and ultimately meant that, under Ohr’s interim leadership, the NLRB would undoubtedly prioritize “advocacy” for workers.²¹

Notably, none of the NLRB employees expressed an objection to Robb’s leadership as a person or manager, but they clearly opposed his views, and those of the Trump administration, on policy.

While it’s generally understood that Republican officials attempt to balance the competing interests of unions, employees and businesses when managing the NLRB and applying the NLRA, the internal emails uncovered by the Foundation reveal that, for many career employees who staff the NLRB, the purpose of their job at the agency is instead to promote unionization and collective bargaining.

Moreover, this view that federal career employees have a right to shape agency policy was shared by President Biden himself, and promoted by NLRB leaders and employees, during the change of administrations.

The day after his inauguration, the White House distributed an unlisted YouTube video featuring President Biden to all federal career employees in which he told them, “You’re the ones running the show.”²² Ohr, then still the regional director of the NLRB’s Region 13 office in Chicago, forwarded the video to his regional staff, describing the message as “inspirational and reaffirming.”²³ A regional attorney then forwarded the message to other NLRB officials, including Ohr, noting that she was “looking forward to new and beautiful things” and recommending that it be shared with all NLRB career employees to “ensure everyone gets the message.”²⁴

¹⁹ Copies of the emails between NLRB employees and Peter Ohr are available here: <https://www.freedomfoundation.com/wp-content/uploads/2021/06/NLRB-2021-000457-final-records-Ohr-correspondence.pdf>

²⁰ *Id.*

²¹ *Id.*

²² The White House. (January 21, 2021). “Message to All Career Staff” [Video]. YouTube. Accessed via the Internet Archive Wayback Machine. March 14, 2021.

<https://web.archive.org/web/20210314133423/https://www.youtube.com/watch?app=desktop&v=4bZqMdkoFAE&noapp=1>

²³ Copies of the NLRB emails discussing President Biden’s message to all career staff are available here:

<https://www.freedomfoundation.com/wp-content/uploads/2021/06/NLRB-2021-000457-final-records-Biden-video.pdf>

²⁴ *Id.*

Following his subsequent appointment to Acting General Counsel, Ohr similarly characterized his work as a longtime NLRB career employee, and that of all other current NLRB career staff, as being fundamentally tied to shaping the agency's policy.

On January 25, 2021, a statement from Ohr accompanying an agency-wide email announcing his appointment emphasized his desire to, “[a]s a career employee of the NLRB,” “continue my work with... agency staff to vigorously enforce the mission of the NLRA,” which he described only as “ensur[ing] workers’ fundamental rights of association at the workplace.”²⁵ In an email sent to all NLRB employees later that day, Ohr leaned further into the idea that career employment at the agency was synonymous with advancing this particular meaning of its purpose, declaring the NLRB to be “my home” and “what defines me” before promising to help the NLRB’s career employees “make significant differences” to “fully effectuate the Act.”²⁶

In his interim role atop the NLRB, Ohr promptly helped President Biden fulfill his campaign promise to be the “most pro-union president in American history,” moving quickly and aggressively to rescind guidance memoranda and other policy positions adopted by his predecessor, many of which attempted to limit union coercion of employees.²⁷

Described by some legal observers as a “record number of seismic policy shifts,”²⁸ such quick actions to implement the Biden administration’s policies were hardly those of an impartial career civil servant merely faithfully carrying out the policy agenda of the elected executive. Rather, as the Foundation’s FOIA probe shows, Ohr and many other NLRB career employees personally opposed the Trump administration’s policies on political or ideological grounds and, throughout President Trump’s first term, did *not* view their role as implementing the policy agenda of the duly elected president, but rather as serving the purported higher purpose of promoting unions.

Career employees within the NLRB ultimately resisted the Trump administration’s policy agenda in a number of ways, including by reportedly (1) drafting misleading legal analyses, (2) refusing to draft decisions, (3) misrepresenting facts about the agency’s union contract, (4) leaking information to the press, (5) manipulating case resolution records, and (6) refusing to follow NLRB protocols for conducting in-person union elections.²⁹

The emails between current and former NLRB career employees and Ohr candidly acknowledged such resistance, simultaneously expressing strong distaste for the Trump administration’s policies and openly celebrating the awaited activist view of the agency’s mission under President Biden—whose policies Ohr and others then promptly implemented.

²⁵ Copies of the emails between NLRB employees and Peter Ohr are available here: <https://www.freedomfoundation.com/wp-content/uploads/2021/06/NLRB-2021-000457-final-records-Ohr-correspondence.pdf>

²⁶ *Id.*

²⁷ Model, A.I., Lolito, M.J., Baskin, M. & Burke, K.E. “Peter Sung Ohr has Cemented the Biden NLRB’s Direction Despite Challenges to his Interim Appointment and Prosecutorial Authority.” *Littler Mendelson P.C.* March 17, 2021. <https://www.littler.com/news-analysis/asap/peter-sung-ohr-has-cemented-biden-nlrbs-direction-despite-challenges-his-interim>

²⁸ Glenn Taubman. “Employee Rights Under Biden’s NLRB Regulatory Regime.” *The Federalist Society*. April 21, 2021. <https://fedsoc.org/commentary/fedsoc-blog/employee-rights-under-biden-s-nlr-regulatory-regime>

²⁹ James Sherk. “Tales From the Swamp: How Federal Bureaucrats Resisted President Trump.” *America First Policy Institute*. January 8, 2025. <https://www.americafirstpolicy.com/issues/20222702-federal-bureaucrats-resisted-president-trump>

In short, OPM is correct to conclude that “policy resistance is a serious concern.”³⁰ The Foundation’s documentation of such resistance among NLRB career employees provides a startling case study into what OPM describes in its notice of proposed rulemaking as a widespread problem throughout federal agencies. Further, the evidence supports OPM’s conclusion that adopting the proposed rule to establish a Schedule Policy/Career category for policy-influencing career employees is indeed necessary to strengthen democracy and promote a nonpartisan civil service.

II. Federal Employee Accountability Affects Civic Participation

The entire premise of American representative democracy rests upon the idea that the government, elected by the people, is ultimately accountable to those it governs.

Federal employee accountability thus not only affects the elected leaders and administrations whose policies government employees are tasked with carrying out; it carries significant implications for all Americans. One of the most fundamental rights granted to the people under the U.S. Constitution is the First Amendment right to “petition the government for a redress of grievances,” which means “to ask the government to provide relief for a wrong through litigation or other governmental action” and also to “join together and seek change from the government” in conjunction with the right to freely and peaceably assemble.³¹

In states and cities around the country, Americans join together for this purpose, forming civic associations or organizations that advocate for changes to government policy or enforcement of existing policies. Where the federal government is concerned, both elected officials and federal career employees should therefore be responsive, professional, competent and fair when engaging with individuals and groups on public policy matters.

Elected officials who fail in this regard can be voted out of office. Career federal employees, however, cannot. As OPM proposes, it is thus crucial to ensure that policy-influencing career employees are held accountable for their performance and conduct by allowing their positions to be moved into a new category of merit-based, at-will employment, Schedule Policy/Career, that will allow federal agencies to more effectively address poor performance, misconduct, or political partisanship within their ranks.

As a nonprofit watchdog organization that regularly seeks to engage with government agencies on the application and enforcement of certain labor laws, the Foundation has, unfortunately, experienced firsthand the capacity of career federal employees to seemingly put their thumb on the scale.

Most notably, in August of 2020, the Foundation filed a formal complaint with the U.S. Department of Labor’s Office of Labor-Management Standards (OLMS) alleging that Working Washington, a Seattle, Wash.-based nonprofit “worker center,” met the definition of a labor organization for the purposes of the federal Labor-Management Reporting and Disclosure Act (LMRDA) and thus had failed to comply with the LMRDA’s various transparency and reporting

³⁰ Improving Performance, Accountability and Responsiveness in the Civil Service. FR Doc. 2025-06904 (April 23, 2025). <https://www.regulations.gov/document/OPM-2025-0004-0001>

³¹ Legal Information Institute. “First Amendment.” Cornell Law School. https://www.law.cornell.edu/wex/first_amendment

requirements intended to protect employees “by promoting democratic procedures within labor organizations.”³²

The 57-page complaint, which included 540 pages of supporting documentation, was the subject of an ongoing district office investigation by OLMS when, in 2022, the investigation was abruptly shut down by a career employee from the agency’s main office in a memorandum sent to all OLMS district directors directing them to close their investigations into seven different worker centers (including Working Washington).³³

Though the agency’s main office provided cursory justifications³⁴ for closing the investigations into each worker center on the basis that none qualified as a labor organization, the unilateral decision to shut down ongoing district investigations, which might have uncovered incriminating evidence had they been allowed to continue, was surprising.

In fact, partial records of the investigation subsequently obtained by the Foundation through a FOIA request indicated that both Working Washington and the national Service Employees International Union (SEIU)—which provided the worker center with significant funding and was thus implicated in the complaint—had been less than fully cooperative with OLMS during the investigation.³⁵

For instance, the OLMS investigation records stated that investigators had sent SEIU a preliminary questionnaire in September of 2020 but that, “Although SEIU... has indicated on multiple occasions... that they are working towards the completion of a formal and comprehensive response to the inquiry, OLMS has yet to receive any substantive response and [the OLMS investigator] is now expressing doubts that SEIU will ever respond...”³⁶

The records similarly described how Working Washington, after returning its initial questionnaire, “was provided with six (6) follow-up questions... regarding points of clarification that need to be made prior to OLMS concluding its inquiry... counsel for Working Washington stated that it would take a month for them to research and provide a formal response. Working Washington has yet to provide a formal response to OLMS’ follow-up questionnaire.”³⁷

Whatever the reasons may have been, it seems notable—and odd—that OLMS investigators were told to stop their investigation before they had even been able to obtain complete information from the complaint’s respondents.

³² Maxford Nelsen. “Freedom Foundation complaint alleges Seattle union front group violating federal labor laws.” Freedom Foundation. August 3, 2020. <https://www.freedomfoundation.com/press-release/freedom-foundation-complaint-alleges-seattle-union-front-group-violating-federal-labor-laws/>

³³ A copy of the memorandum from the OMLS main office to its district directors is available here: https://www.freedomfoundation.com/wp-content/uploads/2025/06/Worker-Center-Memo_02-11-2022_redacted_released.pdf

³⁴ In Working Washington’s case, the Foundation considered the explanation from OLMS questionable. The memo essentially argued that the organization did not have a purpose of “dealing with employers”—a requirement of labor organizations—simply because its attempts to do so were unsuccessful and not reciprocated, implying that an organization’s failure somehow redefines its “purpose” under the meaning of the law.

³⁵ A copy of the OLMS investigation report is available here: https://www.freedomfoundation.com/wp-content/uploads/2025/06/2023-F-12565-Nelson-Records_135pgs_redacted_released-w-out-exhibits.pdf

³⁶ *Id.*

³⁷ *Id.*

All members of the American public—whether policy-oriented organizations like the Foundation or individuals—should have the confidence that when they interface in good faith with federal government agencies, they can trust nonpartisan civil servants to fairly and impartially interpret and apply governmental laws, regulations, and policies independent of their political or ideological biases. Accordingly, OPM’s proposed rule would go a long way toward ensuring that the federal government’s policy-influencing career employees are responsive, fair and accountable to the public they serve.

III. Conclusion

Adopting OPM’s proposed regulation to establish a Schedule Policy/Career category for policy-influencing career employees would greatly increase federal employee accountability and responsiveness to the American people through the political leaders they elect. It would maintain the federal government’s current merit-based hiring practices for such employees and would not permit political patronage or partisanship. However, by allowing policy-influencing career roles to be excepted from the adverse action procedures of 5 U.S.C. § 7501, *et seq.* and converted to at-will positions, OPM’s proposed rule would grant federal agencies and administrations the flexibility needed to hold career employees accountable for poor performance, misconduct and policy resistance. At-will employment was formerly the norm within the federal civil service, and a number of states successfully utilize at-will employment for their career civil servants today.³⁸

Unfortunately, current rules governing the federal civil service allow misconduct and policy resistance to pervade the ranks of an otherwise dutiful and commendable government workforce. As the Foundation has both documented and experienced firsthand, career employee policy resistance is widespread at agencies like the NLRB, and there is currently little to ensure that policy-influencing career employees there and elsewhere operate fairly and with accountability to the American public they serve.

The Freedom Foundation applauds OPM’s proposal to improve performance, accountability and responsiveness in the civil service. We hope this information is helpful in OPM’s efforts to advance this important and worthwhile proposal.

Sincerely,



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³⁸ Glock, Judge and Renu Mukherjee. “Radical Civil Service Reform Is Not Radical: Lessons for the Federal Government from the States.” Manhattan Institute. March 4, 2025. <https://manhattan.institute/article/radical-civil-service-reform-is-not-radical-lessons-for-the-federal-government-from-the-states>