Civil servants have long resisted presidential immigration policies. However, bureaucratic opposition to President Trump's immigration directives is more united and widespread than it has been in response to any previous president. Moreover, while resistance to the policies of past administrations may have led to relenting
by superiors, retaliation against resistance is the norm under the current administration, despite the fact that this resistance has resulted from principled “dissonance” between civil servants’ understanding of their core responsibilities and the priorities emphasized by new political directives. Rather than condemnation, however, frequent incidents of resistance from divergent factions of the immigration bureaucracy, particularly if met with a harsh response from the President, should be characterized as a “fire alarm” imploring a congressional response.

**Cost-Benefit Analysis Under Trump:**
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**Response to Professor Farber’s**
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This is a response to an article by Professor Dan Farber presented in a symposium about the Trump Administration and Administrative Law at the Chicago-Kent College of Law. After agreeing with Professor Farber’s description, analysis and critique of the Trump Administration’s use and abuse of cost-benefit analysis (CBA) as an aid in making regulatory decisions, Professor Pierce makes four points: (1) President Trump will fail to implement his deregulatory agenda; (2) the Environmental Protection Agency’s (EPA) proposed rule on transparency of scientific evidence is a good start on an important project; (3) the Clean Power Plan is a lost cause; and (4) The Trump Administration may unintentionally end the practice of applying cost-benefit analysis to regulatory decisions.

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