DOGE'S MATRIX STRUCTURE AND PRESIDENTIAL POWER

Jason Marisam*

ABSTRACT

At the start of his second term, President Trump created the Department of Government Efficiency (DOGE), a novel White House entity tasked with reshaping the federal bureaucracy. Far more than a traditional advisory commission, DOGE employed a matrix structure that embedded staff across executive agencies, establishing dual reporting lines to both agency heads and the White House. This essay argues that DOGE's organizational design represents a structural innovation in presidential control and an evolution of the longstanding "czar" model. Drawing on organizational and principal-agent theories, the essay explores how the matrix structure enhanced the President's capacity to monitor agency behavior, while simultaneously undermining the autonomy of cabinet officials.

Contents

INTRODUCTION

On the campaign trail in 2024, then-candidate Donald Trump promised to create a "government efficiency commission" run by the world's richest person, Elon Musk.[1] He kept his promise, not by creating just another symbolic advisory group that accomplishes little, but by creating a novel, powerful entity: the Department of Government Efficiency (DOGE).[2] Unusual in both structure and influence, DOGE has come to represent a significant expansion of presidential control over the executive branch.[3]

This essay examines DOGE's structural design and its implications for presidential power. It argues that DOGE's matrix structure constitutes a new tool for executive control, an evolution in how presidents can advance their agendas through the administrative state. A matrix structure, in organizational theory, refers to an arrangement in which employees report to multiple managers—typically a "solid line" supervisor in their home department and a "dotted line" project manager.[4] Matrix structures are common in the private sector and have been employed in some public sector contexts.[5] However, the creation of DOGE, as a matrix structure headquartered in the White House with deep influence across the federal government, was unprecedented.

DOGE embedded personnel directly into executive agencies, where they reported simultaneously to agency heads and to DOGE officials based in the White House.[6] This configuration expanded the President's ability to gather information from within agencies, while diminishing the autonomy of agency heads and reducing internal resistance to presidential preferences. To analyze the creation of DOGE and the whirlwind first four months of its existence, the essay draws on organizational theory and principal-agent theory. It also situates DOGE in the broader tradition of White House czars. The comparison to czars illustrates how DOGE diverged from past practice: whereas czars typically operate from the top down, DOGE mixed top-down

---

* Professor of Law, Mitchell Hamline School of Law.

[1] Michael Gold and Alan Rappeport, *Trump Calls for an Efficiency Commission, an Idea Pushed by Elon Musk*, N.Y. TIMES: TRUMP ADMIN., Sept. 5, 2024, at A1.

[2] Exec. Order No. 14158, 90 Fed. Reg. 8441 (Jan. 20, 2025).

[3] *See infra* Part I.

[4] *See* Maxim Sytch, Franz Wohlgezogen & Edward J. Zajac, *Collaborative by Design? How Matrix Organizations See/Do Alliances*, 29 ORG. SCI. 1130 (2018), https://pubsonline.informs.org/doi/10.1287/orsc.2018.1220 [https://perma.cc/BV8Z-346U].

[5] *See, e.g.*, Michael Bazigos & Jim Harter, *Revisiting the Matrix Organization*, MCKINSEY & CO.: MCKINSEY Q., (Jan. 1, 2016), https://www.mckinsey.com/capabilities/people-and-organizational-performance/our-insights/revisiting-the-matrix-organization [https://perma.cc/GUL2-SSJD?type=image]; John A. Kuprenas, *Implementation and Performance of a Matrix Organization Structure*, 21 INT'L J. PROJECT MGMT. 51 (2003) (describing successful implementation of matrix structure in construction project management).

[6] Exec. Order No. 14158, 90 Fed. Reg. 8441 (Jan. 20, 2025).

centralized control with internal agency monitoring and influence, producing a stronger mechanism for presidential oversight.[7]

This essay proceeds as follows: Part I describes DOGE's creation and its matrix structure; Part II analyzes DOGE though the lens of organizational theory, outlining the benefits and pitfalls of a matrix arrangement from the White House; Part III applies principal-agent theory to explain how DOGE functioned as a secondary agent monitoring cabinet officials and agency personnel in the early months of Trump's second term, as well as the risks this posed to legitimacy and accountability; Part IV compares DOGE to prior uses of White House czars, arguing that the creation of DOGE, a type of "matrixed czar," was a structural innovation that further consolidated presidential authority over the executive branch. The Article concludes by briefly considering future implications.

I. DOGE'S MATRIX STRUCTURE

This Part begins by examining the creation of DOGE by executive order. It then analyzes its formal and informal matrix structures, focusing on the establishment of dual lines of authority. It draws on legal filings and public reporting to understand how the matrix operated in the early months of Trump's second term. Formally, the matrix structure involved DOGE staff embedded in agencies nominally subject to control by their agency heads, but also with reporting lines to DOGE in the White House.[8] Informally, Musk also attempted to create a larger type of matrix structure across the entire government, with reporting lines between DOGE and nearly all federal employees for personnel matters.[9] This reporting structure, though, lacked any formal source of authority and was scrapped after resistance from agency heads.[10]

A. The Creation of DOGE

---

[7] *See infra* Part IV.

[8] Exec. Order No. 14158, 90 Fed. Reg. 8441 (Jan. 20, 2025).

[9] Piper Hudspeth Blackburn, *Trump Administration Rolls Back Elon Musk's Email Telling Federal Employees to Justify Their Jobs*, CNN: Politics (Aug. 6, 2025, at 06:23 ET), https://www.cnn.com/2025/08/06/politics/elon-musk-doge-trump-email [https://perma.cc/D2KE-ZGN2].

[10] *See* Jonathan Swan & Maggie Haberman, *Inside the Explosive Meeting where Trump Officials Clashed with Elon Musk*, N.Y. TIMES: FED. COST-CUTTING INITIATIVE (Mar. 17, 2025), https://www.nytimes.com/2025/03/07/us/politics/trump-musk-doge-power.html [https://perma.cc/58ZN-S8QT].

On January 20, 2025, Trump officially established DOGE, and the related U.S. DOGE Service Temporary Organization by executive order (EO).[11] Technically, DOGE was a reboot of the U.S. Digital Service, an information technology consulting service that had existed in the White House's Office of Management and Budget (OMB).[12] However, Trump not only rebranded the service but moved it out of OMB's reporting chain of command and established it as its own component within the Executive Office of the President (EOP), with a direct reporting line to the President's chief of staff.[13]

Though Trump had proclaimed that Musk was running DOGE, he officially named Amy Gleason as DOGE's acting administrator, insisting Musk was a special government employee consulting with the President.[14] Nevertheless, by public accounts, Musk remained the de facto head of DOGE, with Trump reportedly telling an audience of investors and executives, "I signed an order creating the Department of Government Efficiency and put a man named Elon Musk in charge."[15]

As for DOGE's mission, the EO vaguely, but significantly, shifted DOGE's core mission away from IT consulting and dedicated it "to advancing the President's 18-month DOGE agenda."[16] The EO did not clearly lay out this agenda.[17] That would become apparent through DOGE's actions, as DOGE took a leading role in pushing out and laying off federal employees, dismantling agencies, and cutting federal funding.[18] DOGE's mission seemed to align with a conservative initiative to reshape the government known as Project 2025, which laid out a blueprint on "how to fire supposedly 'un-fireable' federal bureaucrats; how to shutter wasteful and corrupt bureaus and offices; how to muzzle woke propaganda at every level of government; how to restore the American people's constitutional authority

---

[11] Exec. Order No. 14158, 90 Fed. Reg. 8441 (Jan. 20, 2025).

[12] *Id.*

[13] *Id.* (discussing how Trump may have moved DOGE out of OMB to strengthen the argument that DOGE, unlike OMB, is not an agency subject to the Freedom of Information Act); *see* Minho Kim, *Trump's Declaration Allows Musk's Efficiency Team to Skirt Open Records Laws*, N.Y. TIMES: TRUMP ADMIN. (Feb. 10, 2025), https://www.nytimes.com/2025/02/10/us/politics/trump-musk-doge-foia-public-records.html [https://perma.cc/5Q8B-XJES].

[14] *See* Nicholas Nehamas, Kate Conger & Ryan Mac, *A Mystery Solved: Amy Gleason, a Former Health Care Executive, Is Running DOGE*, N.Y. TIMES: TRUMP ADMIN. (Feb. 25, 2025), https://www.nytimes.com/2025/02/25/us/politics/amy-gleason-doge-administrator.html [https://perma.cc/PW5H-2VYV].

[15] Andrea Shalal & Nandita Bose, *Trump Appears to Contradict White House, Says Elon Musk in Charge of DOGE*, REUTERS (Feb. 20, 2025, at 12:27 ET), https://www.reuters.com/world/us/trump-appears-contradict-white-house-says-elon-musk-charge-doge-2025-02-20/ [https://perma.cc/NDK2-NBC8].

[16] Exec. Order No. 14158, 90 Fed. Reg. 8441 (Jan. 20, 2025).

[17] *See id.*

[18] *See infra* Parts I.B & I.C.

over the Administrative State; and how to save untold taxpayer dollars in the process."[19]

B. *DOGE's Formal Matrix Structure*

Structurally, a key novel aspect of DOGE's design was the EO's mandate that DOGE, while located in the White House, would embed staff in agencies throughout the executive branch. The EO required that the head of each agency establish a "DOGE Team" of several employees within their agency.[20] The agency heads did not have complete discretion over who would work on the DOGE agenda within their agencies.[21] Per the EO, they had to consult with the DOGE Administrator when putting together their team, and, though the wording in the EO is vague, it seemed to empower DOGE to assign team members of their choice to an agency.[22] By these terms, the EO set up a structure where embedded DOGE staff would have two reporting lines – one leading to the agency head and the other to DOGE in the White House.[23]

While the EO left many unanswered questions about how exactly DOGE would operate, within the first couple of months of the Trump administration a strategy had emerged. At first, Musk placed dozens of staff members at the two government agencies responsible for human services and government procurement for federal employees, the Office of Personnel Management (OPM) and the General Services Administration (GSA).[24] DOGE then formed small teams at multiple other agencies. Within one month of Trump taking office, DOGE had embedded staff at more than fifteen agencies, including the Departments of Treasury, Agriculture, and Homeland Security.[25]

While DOGE's authorizing EO clearly created a matrix structure, it did not clearly delineate the balance of powers among each supervisor in this structure. In organizational theory, there are a few ways to allocate oversight powers among managers.[26] The manager overseeing the employee's home department can retain primary power over resources and decisions, while a project manager performs a coordinating or advising function. Alternatively,

---

[19] HERITAGE FOUNDATION, MANDATE FOR LEADERSHIP: THE CONSERVATIVE PROMISE 9 (Paul Dans & Steven Groves eds. 2023).

[20] Exec. Order No. 14158, 90 Fed. Reg. 8441 (Jan. 20, 2025).

[21] *Id.*

[22] *Id.*

[23] *Id.*

[24] *See* Eli Murray, June Kim & Jeremy White, *The DOGE Playbook Targeting Federal Agencies*, N.Y. TIMES, March 27, 2025, at A14.

[25] *Id.*

[26] *See* Thomas Sy & Laura Sue D'Annunzio, *Challenges and Strategies of Matrix Organizations: Top-Level and Mid-Level Managers' Perspectives*, 28 HUM. RES. PLAN. 39 (2005).

the dotted line project manager may exercise more power, with the employee's home manager providing support or perhaps acting only as a supervisor for human resources purposes. Or, the multiple managers may have a more equally balanced distribution of power.

With DOGE staff embedded in agencies across the government, who had more power over them – Musk as de facto DOGE head or the agency head? As a litigation position, the Trump Administration claimed the agency heads were the ones with more oversight powers. Consider the record in a multi-state lawsuit involving whether DOGE staff embedded in the Treasury Department could access sensitive data housed there.[27] The district court judge initially enjoined DOGE's access to the data, in part because it was unclear who embedded DOGE staff reported to.[28] The court's reasoning is illustrative of DOGE's novel structure and worth quoting at length:

> It is also unclear from this record whether the agency established clear reporting lines for the Treasury DOGE Team. Although they are nominally agency employees who sit within the Treasury chain of command, it is notable that they also take instructions from officials at USDS/DOGE. How this works in practice, and the uncertainty this creates as to their status as Treasury employees, calls into question their authority to access Treasury record systems. Given the uniqueness of the DOGE Team's almost hybrid status, a more considered process for bringing the DOGE Team on board might have helped clarify these issues.[29]

In response, DOGE submitted signed declarations asserting that Treasury leadership is "responsible for overseeing the Treasury DOGE Team," but "the Treasury Department and the Treasury DOGE Team coordinate with the White House and with [DOGE] to set high-level policy direction and priorities."[30] This evidence successfully helped advance the administration's claim that at least one DOGE staff member could have access to Treasury data because he was, in effect, a Treasury employee under

---

[27] New York v. Trump, 767 F. Supp. 3d 44 (S.D.N.Y. 2025).

[28] *Id.* at 79.

[29] *Id.* at 80.

[30] New York v. Trump, 778 F. Supp. 3d 578, 594 (S.D.N.Y. 2025).

Treasury oversight.[31] Even in this case, though, the court had noted that the Treasury's DOGE team maintained a reporting relationship with DOGE, providing DOGE with regular updates and receiving policy direction.[32]

In another case, the Trump administration reiterated its position that agency heads were the primary overseers of embedded staff, but with less success, at least in the case's early months.[33] The issue in the case was whether DOGE was an agency subject to the Freedom of Information Act, with the government arguing that "the language of the President's executive orders indicate that [DOGE's] function is merely advisory," excluding it from the statute's definition of agency.[34] The court questioned this assertion, pointing to findings that DOGE "has taken numerous actions without any apparent advanced approval by agency leadership" and noting that the government had not submitted anything in the record to establish that DOGE "representatives embedded within agencies act independently of [DOGE.]"[35]

Despite the Trump administration's legal positions, public reporting and comments suggested that DOGE had substantial influence over embedded staff's actions within agencies. Consider the reporting that top officials at the Treasury Department and the U.S. Agency for International Development (USAID) who objected to DOGE's actions were "swiftly pushed aside."[36] While Secretary of State Marco Rubio was nominally in charge of USAID, it was Musk who claimed credit for gutting the agency, stating on the platform X: "We spent the weekend feeding USAID into the wood chipper."[37] Or, take the administration at its own word, when Trump's press secretary stated, "All of the cabinet secretaries take the advice and direction of DOGE."[38]

Whatever the exact balance of power, it is clear that the President designed a matrix structure with multiple reporting lines. In areas of overlapping jurisdiction or ambiguous jurisdictional boundaries between agencies or agency officials, presidents have long had the ability to allocate or adjust relative agency powers in this space.[39] Similarly, with DOGE, the President could easily allocate or adjust the relative responsibilities of DOGE

---

[31] *Id.* at 595.

[32] *Id.* at 598.

[33] Citizens for Resp. & Ethics in Washington v. U.S. DOGE Serv., 349 F.R.D. 1 (D.D.C. 2025).

[34] *Id.* at 6.

[35] *Id.*

[36] *See* Jonathan Swan et al., *Inside Musk's Aggressive Incursion into the Federal Government*, N.Y. TIMES (Feb. 4, 2025), https://www.nytimes.com/2025/02/03/us/politics/musk-federal-government.html [https://perma.cc/LGW5-KSS4].

[37] *Id.*

[38] Caitlyn Frolo, *5 Things to Know about Trump's First Cabinet Meeting*, ABC4 NEWS (Feb. 26, 2025, at 23:38 ET), https://abcnews4.com/news/nation-world/trump-holds-first-cabinet-meeting-of-second-term-with-elon-musk-in-attendance-doge-politics-email-waste-policy-administration [https://perma.cc/5AQ3-ZBZQ].

[39] *See* Jason Marisam, *The President's Agency Selection Powers*, 65 ADMIN. L. REV. 821, 838–89 (2013).

and agency heads as he saw fit.[40] While DOGE often seemed to take the lead, with the backing of the President, there were times when the President reined in DOGE in favor of agency heads, as discussed more in the subsequent section.[41]

The mechanisms the White House used to embed DOGE staff are also worth understanding. While the Trump administration has not been transparent about DOGE, from public sources, it appears they relied on two methods. First, and most simply, the agency directly hired employees to serve on its DOGE team. In legal filings, the Trump administration claimed this was how the Treasury Department's DOGE team lead was embedded.[42] Even this seemingly straightforward hiring, though, was not without its opaqueness. In the same case, the record suggested that DOGE had "placed" the lead in Treasury.[43] Was he hired by Treasury or placed there by DOGE? It is possible it was both. DOGE's authorizing EO states that agency heads must establish DOGE teams, whose members will be "hired or assigned."[44] Perhaps Treasury's DOGE team lead was chosen by DOGE for hire by Treasury.

Less transparent was the administration's use of the Economy Act, which allows one agency to detail its personnel to another agency in exchange for payments to cover the detailed employee's salary.[45] Such interagency agreements are fairly common but typically receive scant attention, and the Economy Act places few procedural restrictions on them.[46] The Trump White House used the Economy Act and its under-the-radar characteristics to embed DOGE staff.[47] From DOGE's perspective, using the Economy Act had the benefit of providing a funding stream for the office.[48] DOGE detailed its staff to agencies, which then transferred money to DOGE to cover their salaries.[49] This allowed DOGE to fill its coffers with payments from agencies

---

[40] *See id.*

[41] Kevin Liptak, Kaitlan Collins & Jeff Zeleny, *Trump Tells Cabinet Members They're in Charge of Staffing as Business Leaders and Republicans Complain About Musk*, CNN: Politics (Mar. 6, 2025, at 21:20 ET), https://www.cnn.com/2025/03/06/politics/trump-musk-cabinet-meeting [https://perma.cc/7LG2-TKAZ].

[42] New York v. Trump, 767 F. Supp. 3d 44, 58–59 (S.D.N.Y. 2025).

[43] *Id.* at 58.

[44] Exec. Order No. 14158, 90 Fed. Reg. 8441 (Jan. 20, 2025).

[45] 31 U.S.C.S. § 1535.

[46] *See* Jason Marisam, *The Interagency Marketplace*, 96 MINN. L. REV. 886, 900–19 (2012) (offering an in-depth analysis of the Economy Act and such interagency personnel details).

[47] *See* John Lewis & Daniel Jacobson, *DOGE and the Three Bears,* YALE J. ON REG.: NOTICE & COMMENT (Feb. 21, 2025). https://www.yalejreg.com/nc/doge-and-the-three-bears-by-john-lewis-daniel-jacobson/ [https://perma.cc/62WR-3GTX].

[48] *Id.*

[49] *Id.*

with appropriated funds, despite lacking its own congressional appropriation.[50]

C. DOGE's Informal Matrix Structure

Beyond asserting authority over embedded DOGE teams, Musk attempted to extend DOGE's reach to federal personnel across the executive branch. More specifically, DOGE attempted to create a dotted line reporting relationship through which nearly all federal employees had to communicate their personnel decisions and weekly accomplishments directly to DOGE.[51] Because this dotted line relationship was not set up in an EO or other White House directive,[52] I refer to this as DOGE's informal matrix structure.

Publicly, this informal matrix came to the fore when DOGE, from OPM email accounts, sent the infamous "Fork in the Road" email in January 2025, which induced federal workers to quit as part of a deferred resignation program.[53] Under the terms of the email, employees who chose to resign would retain all pay and benefits until September 30, 2025.[54] News reports referred to the Fork in the Road program as "part of DOGE head Elon Musk's effort to trim the size of government," explaining that the subject line "Fork in the Road" was "the same language Musk used when he slashed jobs at Twitter after taking over that company in 2022."[55] Ultimately, the White House estimated that 75,000 employees accepted the deferred resignation offer.[56]

DOGE's attempt to exercise authority over federal employees outside the White House continued the following month when OPM sent out another email, this time ordering federal employees to summarize their accomplishments for the week: "Please reply to this email with approx. 5

---

[50] While some have argued that DOGE is not an entity subject to the Economy Act, at least one district court has rejected this position, preliminarily concluding that DOGE "may detail its employees to other agencies consistent with the Economy Act." *See* Memorandum Opinion and Order at 5–6, AFL-CIO v. Dep't of Lab., No. 1:25-cv-00339 (D.D.C. Feb. 14, 2025). Even without the Economy Act, though, DOGE could still have embedded staff directly in agencies, as discussed.

[51] Blackburn, *supra* note 9.

[52] *See* Sytch, Wohlgezogen & Zajac, *supra* note 4.

[53] *See* Nat'l Treasury Emps. Union v. Trump, 770 F. Supp. 3d 1, 4, (D.D.C. 2025).

[54] *Id.*

[55] Will Steakin & Laura Romero, *OPM, Implementing Musk's DOGE Plans, Sends Federal Workers 2nd 'Fork in the Road' Email*, ABC NEWS (Feb. 3, 2025, at 15:10 ET) https://abcnews.go.com/US/opm-implementing-musks-doge-plans-sends-federal-workers/story?id=118401375 [https://perma.cc/UX8Y-LU68].

[56] *See* Chris Cameron, Karoun Demirjian & Madeleine Ngo, *Trump's Federal Resignation Program Moves Ahead After Court Win*, N.Y. TIMES: FED. COST-CUTTING INITIATIVE (Feb. 12, 2025), https://www.nytimes.com/2025/02/12/us/politics/trump-federal-workers-buyout.html [https://perma.cc/WR6Q-HFXY].

bullets of what you accomplished this week and cc your manager."[57] A failure to respond would be taken as a resignation, the email said.[58] Multiple agency heads pushed back, asserting that they were in charge of reviewing their staff's accomplishments and making personnel decisions.[59] Despite the blowback, just days later, OPM sent another government-wide email requesting that workers send weekly emails listing their accomplishments.[60]

The White House ultimately pared back DOGE's authority in this informal matrix, after an explosive cabinet meeting where agency heads clashed with Musk over his meddling in their personnel oversight.[61] The Secretaries of Transportation and State, for example, confronted Musk about DOGE's efforts to lay off employees in their agencies.[62] Trump backed his cabinet secretaries, declaring that the agency heads were in charge of personnel matters, with DOGE advising.[63] This effectively erased the dotted line from nearly all federal employees to DOGE. Instead, DOGE would become a mere advisor for personnel decisions with no reporting oversight.[64] Although the formal matrix structure persisted, the informal, government-wide reporting scheme was short-lived and ultimately discontinued.[65]

II.   AN ORGANIZATIONAL THEORY OF DOGE'S MATRIX STRUCTURE

Organizational theory identifies several potential advantages of adopting a matrix structure over a traditional hierarchical model.[66] These benefits may have influenced the Trump administration's structural choices in establishing DOGE. However, matrix organizations also present notable drawbacks,[67]

---

[57] *See* Kate Conger, Eileen Sullivan & Christina Jewett, *Musk Says Government Workers Must Detail Their Workweek or Lose Their Jobs*, N.Y. TIMES: TRUMP ADMIN. (Feb. 24, 2025), https://www.nytimes.com/2025/02/22/us/politics/elon-musk-email-federal-employees.html [https://perma.cc/8BKY-SH8S].

[58] *Id.*

[59] *See* Chris Cameron & Maggie Haberman, *Some Trump Appointees Resist Musk's Ultimatum to Federal Workers*, N.Y. TIMES: TRUMP ADMIN. (Feb. 23, 2025), https://www.nytimes.com/2025/02/23/us/politics/elon-musk-email-federal-workers.html [https://perma.cc/SRJ2-MEYN].

[60] *See* Madeleine Ngo & Eileen Sullivan, *Federal Workers Again Receive Email Asking Them to Detail Accomplishments*, N.Y. TIMES: TRUMP ADMIN. (Feb. 28, 2025), https://www.nytimes.com/2025/02/28/us/politics/federal-workers-email.html [https://perma.cc/FU8Q-HYPZ].

[61] *See* Swan & Haberman, *supra* note 10.

[62] *Id.*

[63] *Id.*

[64] *See id.*

[65] *See* Daniella Genovese, *Trump Scraps Musk's Federal Worker Weekly Achievement Program Across Government Agencies*, FOX BUS. (Aug. 5, 2025, at 16:57 ET) https://www.foxbusiness.com/politics/trump-scraps-musks-federal-worker-weekly-achievement-program-across-government-agencies [https://perma.cc/6T9K-FWXJ].

[66] Sytch, Wohlgezogen & Zajac, *supra* note 4, at 1132.

[67] *Id.*

some of which became evident in the early months of the administration's second term.

Matrix structures can enhance both efficiency and flexibility within an organization. For example, when specialized expertise is concentrated in one department, a matrix arrangement allows other departments to access that expertise without duplicating resources.[68] This design reduces redundancies and promotes a more cost-effective distribution of talent. Moreover, matrix organizations facilitate the redeployment of personnel across projects and roles, allowing institutions to adapt more readily to shifting priorities.[69] Matrix structures may also foster improved decision-making and collaboration by incorporating diverse perspectives across departments.[70] By embedding employees from multiple units into shared projects, matrix structures reduce insular thinking and encourage a culture of interdepartmental exchange.[71]

Information flow is another potential advantage.[72] Under a strict traditional hierarchy, information may have to move up to the top of a department and, from there, over to other departments, if there are no reporting lines through which information can cut across departments.[73] A matrix structure, by contrast, creates multiple reporting lines that can encourage a more direct interorganizational flow of information.[74]

One can imagine the Trump administration justifying DOGE's matrix structure by highlighting these organizational benefits in service of the President's stated reform goals. Proponents might argue that DOGE incorporated technology and business experts, including Musk, who possessed an advanced understanding of digital infrastructure and systems management.[75] Meanwhile, the agencies themselves have staff knowledgeable about their own agencies' workings.[76] The administration sought to synthesize DOGE's technical expertise with agency-specific institutional knowledge by deploying matrixed teams composed of both

---

[68] *See id.* at 1133.

[69] *See id.*

[70] *Id.*

[71] *Id.*

[72] *See* Daniel A. Levinthal & Maciej Workiewicz, *When Two Bosses Are Better Than One: Nearly Decomposable Systems and Organizational Adaptation*, 29 ORG. SCI. 207, 210 (2018).

[73] *Hierarchical Structure: Definition, How it Works, and Examples*, BOARDMIX, https://boardmix.com/knowledge/hierarchical-structure/ [https://perma.cc/NZT9-3VWT] (last visited Sep. 27, 2025).

[74] *See* Sytch, Wohlgezogen & Zajac, *supra* note 4, at 1132.

[75] *See* Sarah Cahalan et al.*, The People Carrying Out Musk's Plans at DOGE*, N.Y. TIMES: POLITICS (June 16, 2025), https://www.nytimes.com/interactive/2025/02/27/us/politics/doge-staff-list.html [https://perma.cc/MR8G-JEJD].

[76] Dorothy Leonard, John Malgeri & Cayly Dixon, *Building and Transferring Expert Knowledge within Federal Agencies*, FED. NEWS NETWORK (Oct. 28, 2021, at 09:41 ET), https://federalnewsnetwork.com/commentary/2021/10/building-and-transferring-expert-knowledge-within-federal-agencies/ [https://perma.cc/6K6T-NB5W].

DOGE and agency personnel.[77] This expertise rationale appears explicitly in an internal memo detailing the placement of a DOGE staff member in the Department of Justice's immigration unit, citing the DOGE member's "specialized skills" in software engineering and systems design as instrumental in leveraging personal data to help the agency's immigration enforcement.[78]

The matrix arrangement also reinforced alignment with the President's agenda. By involving actors outside the agency's traditional hierarchy, the administration could reduce institutional resistance to reform or dismantling efforts. The direct reporting line to DOGE ensured that information relevant to the mission quickly found its way into the White House, without being filtered through the agency's internal chain of command.[79] When the mission was accomplished at one agency, DOGE staff could be repurposed to another agency, depending on the administration's needs.[80]

Despite its advantages, matrix structures introduce significant complications, many of which became apparent early in Trump's second term. Chief among these complications is the ambiguity introduced by dual lines of authority.[81] Employees in a matrix may receive conflicting directives from multiple supervisors, leading to internal tension and inefficient workflows.[82] Accountability can also be diluted.[83] When authority is shared or unclear, it becomes difficult to determine who is ultimately responsible for outcomes.[84]

These structural pathologies were evident in DOGE's controversial February 2025 directive requiring all federal employees to submit weekly reports or risk termination.[85] Some agency leaders bristled at what they saw as an incursion on their turf.[86] The Department of Defense, for instance, instructed its employees to disregard the directive and issued a formal statement asserting exclusive authority over its personnel evaluations: "The Department of Defense is responsible for reviewing the performance of its personnel and it will conduct any review in accordance with its own procedures."[87] The conflict was resolved when Trump clarified that the

---

[77] Exec. Order No. 14158, 90 Fed. Reg. 8441 (Jan. 20, 2025).

[78] Glenn Thrush, *Top DOGE Officials Moved from Social Security Administration to Justice Dept.*, N.Y. TIMES: U.S. Immigration (Apr. 18, 2025), https://www.nytimes.com/2025/04/18/us/politics/doge-musk-social-security-justice-department.html [https://perma.cc/94L9-TM7Z].

[79] *Id.*

[80] *See id.*

[81] *See* Levinthal & Workiewicz, *supra* note 72, at 211.

[82] *Id.* at 212.

[83] Sy & D'Annunzio, *supra* note 26, at 45.

[84] *See id.*

[85] *See supra* discussion Part I.C.

[86] *See* Conger, Sullivan & Jewett, *supra* note 57.

[87] Cameron & Haberman, *supra* note 59.

agency heads had primary authority in this space.[88] In other instances, though, public displays of conflict were avoided because the administration quickly established that DOGE had the bulk of the power. Recall the reporting that some top agency officials who objected to DOGE's actions were "swiftly pushed aside."[89]

Ambiguity in accountability, another potential pitfall of matrix structures, was not merely a liability but occasionally a strategic asset for the administration. Publicly, Trump proclaimed that Musk was the head of DOGE and gave Musk a platform, even allowing him to speak from the White House and in cabinet meetings.[90] This ambiguity allowed Trump to publicly align with Musk when his celebrity status and vast wealth were potential advantages to the President.[91] Musk himself took credit for many of the administration's decisions.[92] Conversely, in legal contexts where the administration wanted to portray the statutorily authorized agency heads as the primary decision-makers, the Trump administration asserted Musk and DOGE were merely advisory.[93]

In any matrix structure, the question of authority and responsibility often arises.[94] The Trump administration navigated this ambiguity strategically, alternating between empowering DOGE and deferring to agency heads, depending on the political or legal advantage.[95]

III.   A PRINCIPAL-AGENT THEORY OF DOGE

The President's design of DOGE can also be understood through principal-agent theory.[96] Under this framework, a president (the "principal") generally seeks to ensure that executive branch officials ("agents"), such as agency heads whom he appoints and may remove, act in accordance with his preferences. However, some divergence between the preferences of

---

[88] *See* Swan & Haberman, *supra* note 10.

[89] *See* Swan et al., *supra* note 36.

[90] Elena Moore, *Trump and Musk Appear Together in the Oval Office to Defend the Work of DOGE*, NPR: Politics (Feb. 11, 2025, at 21:14 ET), https://www.npr.org/2025/02/11/nx-s1-5293504/trump-musk-doge-oval-office [https://perma.cc/KL6H-GFH7].

[91] *See* Jonathan Swan, Maggie Haberman & Theodore Schleifer, *For Trump, Musk Is a Scapegoat and a Liability. But for Now, He's Still Useful.*, N.Y. TIMES: TRUMP ADMIN. (Apr. 2, 2025), https://www.nytimes.com/2025/04/02/us/politics/trump-musk-wisconsin.html [https://perma.cc/LY8K-WFLM].

[92] *See* Swan et al., *supra* note 36.

[93] *See supra* Part I.B.

[94] Sy & D'Annunzio, *supra* note 26, at 40.

[95] *See supra* Part II.

[96] *See generally* Jacob E. Gersen & Adrian Vermeule, Essay, *Delegating to Enemies*, 112 COLUM. L. REV. 2193 (2012) (developing principal-agent framework for understanding delegation in administrative law); Matthew C. Stephenson, *Information Acquisition and Institutional Design*, 124 HARV. L. REV. 1422, 1440–46 (2011) (offering public law analysis using principal-agent theory).

principals and their agents is inevitable.[97] The key question becomes: how can a president minimize the risk that agency heads will deviate from his objectives? One strategy is to introduce a secondary agent—here, Musk and the DOGE staff—tasked with monitoring the actions of the primary agents.[98] While this additional oversight can enhance compliance, it may also impose significant costs, particularly for public governance and accountability.

Enhanced monitoring capacity is one of the principal benefits of appointing a second agent.[99] Presidents typically lack the time or capacity to directly oversee agency heads.[100] A second agent can serve as an intermediary, helping ensure compliance with presidential directives. Additionally, the second agent may bring expertise that the principal lacks, offering more informed assessments of the primary agent's decisions. However, this expertise can also narrow the second agent's field of vision, making them prone to misperceiving the first agent's broader institutional context.[101] This dynamic can result in outcomes worse than if the primary agent operated without such oversight.[102]

A second agent may also enhance institutional legitimacy. By introducing an additional layer of review, a president can signal a commitment to oversight and transparency.[103] This is especially relevant in the public sector, where perceptions of procedural fairness are important.[104] Yet this benefit has a corollary risk: when the second agent is less accountable than the first, legitimacy may suffer.[105] For example, if the primary agent is a statutory agency subject to congressional oversight, legal constraints, and professional norms, it may possess stronger institutional legitimacy than a second agent who is not subject to equivalent restrictions. In such cases, the oversight role risks appearing less credible, even if it occasionally exposes inefficiency.

These theoretical tradeoffs played out clearly in the case of DOGE. The President centered DOGE as a core instrument of his second-term

---

[97] Gersen & Vermeule, *supra* note 96, at 2196.

[98] *See* Jacob E. Gersen & Matthew C. Stephenson, *Over-Accountability*, 6 J. LEGAL ANALYSIS 185, 213–31 (2014).

[99] *See id.* at 218–19.

[100] Nicholas R. Bednar, *Presidential Control and Administrative Capacity*, 77 STAN. L. REV. 823, 830–31, 871–72 (2025).

[101] *See* Jeffrey J. Rachlinski & Cynthia R. Farina, *Cognitive Psychology and Optimal Government Design*, 87 CORNELL L. REV. 549, 560, 580–82 (2002) (on expert agencies' myopia).

[102] *Id.* at 558.

[103] *See* Gersen & Stephenson, *supra* note 98, at 188–89.

[104] Mark Fenster, *The Transparency Fix: Advocating Legal Rights and Their Alternatives in the Pursuit of a Visible State*, 73 U. PITT. L. REV. 443, 446 (2012).

[105] Shirin Sinnar, *Protecting Rights from Within? Inspectors General and National Security Oversight*, 65 STAN. L. REV. 1027, 1031–32 (2013).

agenda.[106] Directly tasking his cabinet agencies to enact the DOGE agenda may not have achieved the full results he wanted, because the cabinet heads themselves may not have been as committed to gutting the agencies they oversaw and from which they derived their power. In contrast, Musk and the DOGE staff appeared ideologically committed to the President's goals.[107] Their placement as monitoring agents increased pressure on cabinet officials to comply, creating an enforcement mechanism for presidential preferences.[108]

DOGE's monitoring role surfaced explicitly during a cabinet meeting in early 2025, where Musk criticized multiple cabinet secretaries for making insufficient cuts to their personnel, and some of the agency heads pushed back.[109] As reported by *The New York Times*, Trump observed these disputes sitting "back in his chair, arms folded, as if he were watching a tennis match."[110] Seemingly, Trump was evaluating his agency heads based on DOGE's critiques, using inter-agent conflict as a source of information.

DOGE's role as a technical expert, though, was undercut by frequent displays of institutional myopia. Although Musk and his team emphasized technological proficiency, they appeared to lack an understanding of the bureaucratic systems they aimed to reform.[111] For instance, DOGE launched a "Wall of Receipts" website to showcase purported cost savings from canceled contracts.[112] However, the site was riddled with errors: inflated dollar amounts, triple-counted contracts, and claims of savings from contracts already terminated.[113] Rather than projecting competence, the site revealed a poor grasp of government contracting practices.

Similarly, although the administration framed DOGE as a force for transparency, tasked with rooting out fraud and inefficiency, its limited accountability mechanisms undermined this objective. Investigative reporting revealed that DOGE's fraud claims were frequently exaggerated or inaccurate.[114] For example, Musk's allegations of widespread Social Security

---

[106] Jordana Comiter, *Why Are Donald Trump and Elon Musk Fighting? A Timeline of Their Friendship and Explosive Fallout*, PEOPLE (June 9, 2025, at 15:25 ET), https://people.com/donald-trump-elon-musk-feud-timeline-11749663 [https://perma.cc/373Z-4HDE].

[107] *Id.*

[108] *Id.*

[109] Swan & Haberman, *supra* note 10.

[110] *Id.*

[111] *See* Emily Badger, *Musk's Latest Fraud Finding Isn't What It Seems*, N.Y. TIMES: TRUMP ADMIN. (Apr. 12, 2025), https://www.nytimes.com/2025/04/12/upshot/musk-doge-fraud-claims.html [https://perma.cc/JJL5-FMDF].

[112] *See* Ethan Singer & Emily Badger, *See How Elon Musk's Team Inflated, Deleted and Rewrote Its Savings Claims*, N.Y. TIMES: TRUMP ADMIN. (Mar. 13, 2025), https://www.nytimes.com/2025/03/13/upshot/musk-doge-changes-deletions.html [https://perma.cc/VH85-VEWN].

[113] *Id.*

[114] *See* Badger, *supra* note 111.

fraud were either misleading or reflected a misunderstanding of the program.[115] These deficiencies were especially troubling given DOGE's displacement of more legitimate watchdogs, like Inspectors General (IGs), who typically have investigated allegations of government fraud and waste.[116] They are subject to well-established norms and formal checks, including congressional testimony and public reporting obligations.[117] By contrast, DOGE operated without equivalent transparency, and its interventions lacked the procedural rigor expected of traditional oversight bodies.[118]

From the President's perspective, DOGE was likely seen as a successful second agent. It monitored agencies and agency heads, and it energetically enacted his controversial agenda, despite resistance and public uproar.[119] From a public welfare perspective, though, DOGE is a cautionary tale about the downsides of second agents. Its myopia and illegitimacy led to reckless, shoddy work that has scarred the public sector.[120]

IV.   FROM WHITE HOUSE CZAR TO MATRIXED CZAR

For decades, presidents have exercised influence over the executive branch through the use of so-called White House "czars" – that is, advisors who coordinate policy across agencies without formal statutory authority.[121] Musk and DOGE share many attributes commonly associated with czars and have attracted similar criticisms.[122] However, a key distinction sets them apart: DOGE's embedded matrix structure. This organizational innovation marks the evolution of a new presidential tool for exerting executive control.

This Part begins by defining the czar's role and briefly tracing its development. It then examines how DOGE mirrored czar-like behavior while expanding the President's influence through a matrix system that embedded staff within agencies. Ultimately, DOGE's design enhanced the President's

---

[115] *See* Emily Badger & Minho Kim, *Millions of Dead People on Social Security? The Agency's Own Data Says Otherwise.,* N.Y. TIMES (Feb. 19, 2025) https://www.nytimes.com/2025/02/19/upshot/social-security-fraud-claim-musk.html [https://perma.cc/V9M9-LW2Z].

[116] *See* 5 U.S.C.S. § 402.

[117] *See* Sinnar, *supra* note 105, at 1034.

[118] Brad Heath & Tim Reid, *DOGE Website Offers Error-Filled Window Into Musk's Government Overhaul*, REUTERS (Mar. 5, 2025), https://www.reuters.com/world/us/doge-website-offers-error-filled-window-into-musks-government-overhaul-2025-03-04/ [https://perma.cc/5VGS-8SB2].

[119] *See* Swan et al., *supra* note 36.

[120] Heath & Reid, *supra* note 118.

[121] Kevin Sholette, *The American Czars*, 20 CORNELL J.L. & PUB. POL'Y 219, 221 (2010).

[122] *See, e.g.*, Jess Bidgood, *Fighting Musk's Secrecy, in Court*, N.Y. TIMES: NEWSLETTER ON POLITICS (Feb. 28, 2025), https://www.nytimes.com/2025/02/28/us/politics/elon-musk-doge-lawsuits.html [https://perma.cc/A977-XSNX].

monitoring capacity and diminished the institutional independence of agency heads.

A. White House Czars

"Czar" typically refers to a senior presidential advisor tasked with overseeing a significant policy domain.[123] These advisors generally share four features: they are situated within the Executive Office of the President (EOP), coordinate agency actions in line with presidential initiatives, lack formal statutory authority, and are appointed without Senate confirmation.[124]

While early versions of czar-like roles appeared under President Woodrow Wilson, the position gained more prominence under President Richard Nixon, who appointed an "energy czar," and later President George H.W. Bush, who appointed a "drug czar."[125] President Obama further expanded the use of czars, assigning them oversight of key areas such as healthcare, climate policy, and the auto industry bailout.[126]

The influence of a czar can vary with their policy portfolio and perceived proximity to the president.[127] While in some instances czars merely facilitate interagency coordination, in others they may exercise de facto policymaking power.[128] A czar may have more power than a cabinet secretary, depending on their proximity to the president and other factors.[129] For instance, President Obama's "climate czar," Carol Browner, was widely viewed as more influential than the Senate-confirmed EPA Administrator, due to her prior public leadership and visibility.[130]

Whether one views czars as a good or bad development may depend on one's views on executive power. For those who favor an energetic executive, czars are consistent with the broad discretion granted to presidents to structure the White House and rely on aides and advisors.[131] Czars can help presidents manage pressing policy issues without waiting for congressional approval or more standard bureaucratic action.[132] Czars can also perform an important coordination function.[133] The modern federal bureaucracy involves

---

[123] *See* Aaron J. Saiger, *Obama's "Czars" for Domestic Policy and the Law of the White House Staff*, 79 FORDHAM L. REV. 2577, 2583 (2011).
[124] *Id.* at 2583, 2598.
[125] Sholette, *supra* note 121, at 221.
[126] Saiger, *supra* note 123, at 2577–78, 2582.
[127] *See id.* at 2587–90.
[128] *See id.* at 2588–92.
[129] *See id.* at 2590.
[130] *See id.* at 2577–78.
[131] *See generally* Elena Kagan, *Presidential Administration*, 114 HARV. L. REV. 2245 (2001) (arguing that presidential oversight of agency action enhances democratic accountability and legitimacy).
[132] Saiger, *supra* note 123, at 2593–94.
[133] *Id.* at 2588.

agencies with overlapping and fragmented authority.[134] Major policy problems cut across multiple agencies' jurisdictions.[135] Czars can help coordinate interagency responses and ensure that agencies effectively implement presidential priorities.[136] In short, czars are one tool presidents can use to ensure policy coordination, cohesion, and responsiveness to presidential control.

The standard critique of czars involves concerns about transparency and accountability.[137] Because czars are not confirmed by the Senate and are less likely to be hauled to Capitol Hill for public testimony,[138] they can operate with less public accountability. Along these lines, some have criticized czars for undermining constitutional checks and balances.[139] Under this view, czars are part of a broader trend of executive aggrandizement that avoids congressional checks.[140]

Obama, in particular, received significant criticism for his use of czars. One Democrat Senator wrote to object that Obama's czars "have taken direction and control of programmatic areas that are the statutory responsibility of Senate-confirmed officials" and "have been allowed to inhibit openness and transparency, and reduce accountability."[141] The White House's response to these criticisms was that the czars do not "supplant or replace" administrative agencies but instead merely "help coordinate their efforts and help devise comprehensive solutions to complex problems."[142]

B. DOGE as a "Matrixed Czar"

---

[134] *See, e.g.*, Jody Freeman & Jim Rossi, *Agency Coordination in Shared Regulatory Space*, 125 HARV. L. REV. 1131, 1138–1145 (2012); Jacob E. Gersen, *Overlapping and Underlapping Jurisdiction in Administrative Law*, 2006 SUP. CT. REV. 201, 203 (2007); Jason Marisam, *Interagency Administration*, 45 ARIZ. ST. L.J. 183, 184–85 (2013); Jason Marisam*, Duplicative Delegations*, 63 ADMIN. L. REV. 181, 189–90 (2011) [hereinafter Marisam, *Duplicative Delegations*], (demonstrating how interagency coordination and overlapping authority have been the subject of an extensive administrative law literature).

[135] *See* Marisam, *Duplicative Delegations*, *supra* note 134, at 182.

[136] *See* Saiger, *supra* note 123, at 2588–95.

[137] *See* Saiger, *supra* note 123, at 2579–89.

[138] *Id.* at 2594.

[139] *Id.* at 2596.

[140] *See generally* Peter M. Shane, *Political Accountability in a System of Checks and Balances: The Case of Presidential Review of Rulemaking*, 48 ARK. L. REV. 161 (1995) (arguing that presidential oversight of agency rulemaking raises constitutional concerns about separation of powers and accountability).

[141] John Breshnahan, *Byrd: Obama in Power Grab*, POLITICO (Feb. 25, 2009, at 10:34 ET), https://www.politico.com/story/2009/02/byrd-obama-in-power-grab-019303 [https://perma.cc/P8S3-YDCE].

[142] Letter from Gregory B. Craig, Counsel to the President, to Sen. Russell D. Feingold 96 (Oct. 5, 2009), https://www.congress.gov/111/chrg/CHRG-111shrg57708/CHRG-111shrg57708.pdf [https://perma.cc/G94U-4KMH].

From the beginning of Trump's second term, Musk and DOGE clearly exhibited the defining features of White House czars: they operated within the EOP, directed a presidential initiative, lacked statutory authority, and were appointed without Senate confirmation.[143] However, DOGE departed from this traditional model through its matrix structure. This structural innovation transformed the czar model into a deeper, more invasive tool of presidential control.

Some structural criticisms of DOGE echoed the critiques launched against more traditional czars. Musk was attacked as an unelected advisor who lacked Senate confirmation and public accountability, despite exercising broad influence over federal personnel and policy implementation.[144] Just as Republican senators attacked Obama's czars,[145] Democratic senators attacked Musk for "subverting the Constitution" by leading a government office without Senate confirmation, while others attacked Musk for not testifying before Congress.[146] This critique even undergirded some legal challenges to DOGE, with the multi-state plaintiffs in *New Mexico v. Musk* arguing that Trump vested Musk with broad authority that rendered him a principal officer under the Constitution who had to receive Senate confirmation.[147] The White House responded to these critiques with arguments that echoed Obama's defense of his czars: "Like other senior White House advisors, Mr. Musk has no actual or formal authority to make government decisions himself. Mr. Musk can only advise the President and communicate the President's directives."[148]

However, DOGE's matrix structure and embedding of staff into agencies marked a structural evolution of the czar model. This new "matrixed czar" configuration enhanced presidential power in two principal ways: (1) it increased the White House's ability to monitor internal agency operations,[149] and (2) it undermined agency heads' autonomy by weakening hierarchical

---

[143] *See supra* Part I.A.

[144] *See* Thomas B. Edsall, Opinion, *Elon Musk Is Leading a 'Hostile Takeover of the Federal Government'*, N.Y. TIMES: GUEST ESSAY (Feb. 18, 2025), https://www.nytimes.com/2025/02/18/opinion/musk-trump-doge-tech.html [https://perma.cc/39HB-J2VS].

[145] Jay Newtown-Small, *Senators Take on Obama's Czars*, TIME: POLITICS (Oct. 22, 2009, at 00:00 ET), https://time.com/archive/6937185/senators-take-on-obamas-czars/ [https://perma.cc/7PEX-M7FH].

[146] *See* Lauren Irwin, *Senate Democrat: 'Musk Is About Subverting Constitution'*, HILL: ADMIN. (Feb. 11, 2025, at 09:19 ET), https://thehill.com/homenews/administration/5137891-ron-wyden-elon-musk-doge-payment-systems-access/ [https://perma.cc/5S35-X5CW]; Lauren Irwin, *Musk a 'Coward' If He Won't Testify Before Congress: House Democrat*, HILL, (Feb. 6, 2025, at 09:19 ET) https://thehill.com/homenews/house/5129926-seth-magaziner-elon-musk-subpoena-doge/ [https://perma.cc/K6EQ-8JGP].

[147] New Mexico v. Musk, 784 F. Supp. 3d 174, 185 (D.D.C. 2025).

[148] Joey Garrison, *Elon Musk Isn't Actually in Charge of DOGE, White House Says*, USA TODAY: POLITICS (Feb. 18, 2025, at 17:59 ET) https://www.usatoday.com/story/news/politics/2025/02/18/elon-musk-doge-white-house/79070607007/ [https://perma.cc/WQ2G-ZZ4G].

[149] *See New Mexico*, 784 F. Supp. 3d, at 187.

reporting lines.[150] Whereas traditional czars monitor from the top down, embedded staff provide bottom-up visibility.

By placing DOGE personnel within agencies, the White House gained direct access to operational data, bypassing traditional bureaucratic channels. Consider the fight over whether DOGE could access sensitive Treasury data. The multi-state plaintiffs argued in court that only career civil servants who have received proper training should have access, and they expressed concerns that DOGE intended to flag and freeze Treasury payments based on DOGE staff administering an "ideological litmus test."[151] Part of their concern seems to have been that an agent more obviously loyal to the President was gathering data and making consequential decisions at the grassroots of an agency.[152] That kind of ideological loyalty is the advantage a president gains from using this matrix model of embedding.

Second, embedding agents in the agencies can also benefit an imperialistic president by weakening cabinet secretaries and thus weakening one possible source of resistance. It was not that long ago that cabinet secretaries felt they could push back against presidential directives they disagreed with.[153] This political capital came about in part because of postwar administrative reforms aimed at solidifying agency head authority.[154] In the 1940s, Congress tasked former President Herbert Hoover with studying the federal bureaucracy.[155] The resulting Hoover Commission concluded that authority within departments was too fragmented among multiple authorities and recommended consolidating power in agency heads.[156] By the end of the twentieth century, traditional, unified hierarchical structures with a clear chain of command up to the agency head were the dominant, though not exclusive, mode for cabinet departments.[157]

DOGE's matrix model disrupted this hierarchical norm. By embedding personnel who reported outside the agency chain of command, it introduced alternative lines of authority that diluted agency heads' control. This dynamic rendered cabinet officials effectively subordinate to DOGE teams operating

---

[150] *See New Mexico*, 784 F. Supp. 3d at 190.

[151] Hurubie Meko, *Judge Says One DOGE Member Can Access Sensitive Treasury Dept. Data*, N.Y. TIMES: TRUMP ADMIN. (April 11, 2025) https://www.nytimes.com/2025/04/11/nyregion/doge-treasury-lawsuit.html [https://perma.cc/CV5N-989V].

[152] *See id.*

[153] *See* Peter L. Strauss, *Overseer, or "The Decider"? The President in Administrative Law*, 75 GEORGE WASH. L. REV. 696, 736 (2007).

[154] *See generally* Gillian E. Metzger & Kevin M. Stack, *Internal Administrative Law*, 115 MICH. L. REV. 1239, 1266–72 (2017) (tracing how post-war administrative reforms consolidated authority in agency heads to create unified hierarchical structures).

[155] *See* Peri E. Arnold, *The First Hoover Commission and the Managerial Presidency*, 38 J. POL. 46, 47–50 (1976).

[156] THE HOOVER COMMISSION REPORT ON ORGANIZATION OF THE EXECUTIVE BRANCH OF THE GOVERNMENT 24 (1949).

[157] *See* Jennifer Nou, *Subdelegating Powers*, 117 COLUM. L. REV. 473, 475–76 (2017).

within their own agencies. Consider the news reports that Secretary of State Rubio was "privately furious" after DOGE shuttered USAID, an agency nominally under his purview.[158] This was a remarkable piece of reporting. The Secretary of State, usually one of the most prestigious and powerful positions in the government, was sidelined by a DOGE team consisting of staff who were supposed to be reporting to him.[159]

As Professor Peter Strauss once observed, there was a time when cabinet secretaries could resist presidential directives with confidence, knowing they had the political capital to prevail.[160] For at least the past couple of decades, though, it seems cabinet secretaries' political capital has been waning in favor of presidential power.[161] DOGE has accelerated that trend. Through DOGE, President Trump realized a more complete form of executive control, where the White House influenced agencies from the top down and from embedded loyalists working within the agencies at their grassroots.

V.   CONCLUSION

In the early months of his second term, President Trump expanded his control over the executive branch in part by deploying a novel matrixed structure from the White House.[162] This approach allowed him to expand oversight of the executive branch and bypass traditional channels of authority, reducing the autonomy of cabinet officials.[163] In doing so, he added another tool to the modern president's toolbox for executive control.

Will future presidents use this tool, or will it be unique to the second Trump administration? Although it is possible that DOGE will remain the lone matrixed czar in presidential history, precedent suggests otherwise. Innovations in presidential control, once introduced, are often adopted by subsequent administrations.[164] The recurring use of White House czars across presidencies is one such example.

This does not mean future presidents will use a matrixed czar to serve similar ends, though. As a tool, the matrixed czar model is not inherently conservative or destructive. One can easily imagine a progressive president employing it to revitalize the federal government and pursue ambitious reforms. Nevertheless, for those increasingly wary of the continual expansion

---

[158] Swan & Haberman, *supra* note 10.

[159] *See id.*

[160] Strauss, *supra* note 153, at 736.

[161] *See* Andrew Prokop, *Trump Is Setting Up the Government in a Way That Promises Chaos*, VOX: POLITICS (Jan. 20, 2017, at 08:43 ET) https://www.vox.com/2017/1/19/14265392/trump-cabinet-executive-branch [https://perma.cc/F9YP-S744].

[162] Exec. Order No. 14158, 90 Fed. Reg. 8441 (Jan. 20, 2025); *see a* Part IV.B.

[163] *See* New Mexico v. Musk, 784 F. Supp. 3d 174, 187 (D.D.C. 2025).

[164] *See* Saiger, *supra* note 123 at 2587–88.

of presidential power, the creation and potential future use of matrixed czars may represent yet another significant cause for concern, regardless of who holds the presidency.[165]

---

[165] *See, e.g.*, Blake Emerson & Jon D. Michaels, *Abandoning Presidential Administration: A Civic Governance Agenda to Promote Democratic Equality and Guard Against Creeping Authoritarianism*, 68 UCLA L. Rᴇᴠ. 104, 117–118 (2021).