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Paper Tigers in the Clinic? Rhetorical Argument Fields in Health Policy Implementation

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Abstract

In this chapter, I explore the relation between argumentation and health policy implementation. More specifically, I explore how persistent issues around the implementation of policy can be elucidated by rhetorical argumentation theory, namely from the perspective of argument fields theory. Argument fields theory accounts for why some forms of argumentation gain acceptance in some settings and less so in others. To explore this in practice, I take up a case of risk communication between medical authorities and healthcare practitioners as a case study of communication between two different argument fields. The authorities regularly send practitioners clinical safety advisories (i.e., new policies), but, as I show in a read-aloud text response analysis, clinical physicians read the advisories with a good deal of skepticism. They question the authorities' justifications for the new policy from within their medical practice with questions such as 'Why would this be relevant to me?' I provide a sketch of argument fields theory to suggest that unresolved issues about the definition and scope of argument fields may limit its value to rhetorical analysis. Finally, reflecting on the risk communication case study, I offer some perspectives on how literature on rhetorical policy studies and the materiality of rhetoric can provide new insights

into how the material constraints and commitments of arguers shape argumentation and their evaluation of arguments.

Introduction

Although rhetorical argumentation is often associated with public deliberation and dissociated from legal and technical spheres (e.g. Goodnight (2012)), this chapter aims to show how a rhetorical approach to argumentation may also contribute to technical spheres of policy. In some subfields of rhetoric, like rhetoric of science and rhetoric of health and medicine, argumentation in policy and policymaking is an established theme of research (Meloncon and Scott 2017; Asen 2010). Likewise, since the early 1990s, the field of policy analysis has taken an ‘argumentative turn’ of its own (Fischer and Forester 1993). Whereas conventional policy analysis has a more decisionist focus on empirical measurement of inputs and outputs based on abstract rational choice principles, proponents of the argumentative approach to policy recognize normative pluralism as the basis of policy work and highlight that policies and their implementation are expressions of values and preferences. As Majone argued in his seminal book from 1989: “Good policy analysis is more than data analysis or a modelling exercise; it also provides standards of argument and an intellectual structure for public discourse” (1989, 7). Reconsidering the relation between rhetoric and policy may also unsettle the established separation of policy and politics. ‘Politics’ is conventionally associated with interest formation, electoral public discourse and public opinion and ‘policy’ with technical substance and operative terms like planning, instruments, problem-solving, choice architectures, organizational structures. An argumentative approach based on rhetorical theory may elucidate how decisions in policy—like decisions in politics—are contingent, marked by uncertainty and informed by ideology.

This chapter examines argumentation about *policy implementation*. The implementation of a new policy in an existing practice raises important questions about the relation between

argumentation and practice, and between multiple forms of rationality and claims of expertise. If we understand policy to mean an intent to achieve specific outcomes accompanied by new guidelines for decision-making to reach those outcomes, argumentation is central to policy implementation: How is a policy argued for and justified at the sites where it is implemented? How are claims about objectives and changes to practice justified? What does it matter who is responsible for implementation (citizens, professionals etc.)? The impetus for this chapter is a study I conducted with Danish primary care physicians about their perception of safety advisories for medicines from medical authorities (Møllebæk and Kaae 2020, 2022). Informed by the ‘read aloud’ method in rhetorical audience research (Bengtsson 2018), I asked them to read aloud and react to a safety advisory they had received from regulatory authorities regarding an anti-coagulant medicine. Interestingly, I found that they intuitively engaged in argumentation about their clinical practices and the different conditions of their work. For example, they instantly provided counterarguments to the authorities’ risk assessments; they speculated about the intended audience for this specific letter; and they attempted to reconstruct the rhetorical situation that caused this letter to be distributed. These findings illustrate the foundational rhetorical point that texts, such as safety advisories, are not merely vehicles of information or propositions but also have generative effects on their readers: ‘Why are they sending this? What do they want from me?’ That is, receiving the text serves as an exigence for generating new arguments and a medium for engaging in some form of conversation with counterparts in which argumentation and justification are key activities.

In this chapter I argue that scholarship on rhetorical argumentation has insights to contribute to policy research, particularly in terms of how policies are justified and evaluated in different manners across different social and institutional settings. Part of that contribution is the concept of argument fields. Stephen Toulmin’s introduction of the notion of argument fields in *The Uses of Argument* (Toulmin 2003 [1958]) instigated a new interest in how argumentation unfolds differently across social and

institutional settings and how interlocutors may evaluate argumentation differently according to their social and institutional setting. More than merely recognizing the variation of argumentation in different social contexts, Toulmin propelled a rhetorical understanding of argumentation by promulgating the position that the soundness of arguments was not certain nor universal across situations. Instead, Toulmin argued, argumentation was contingent and dependent of the 'field' in which it was articulated. Two arguments belong to the same field, he argued, when their conclusion and data follow the same type of logic, and conversely, two arguments do not belong to the same field if their conclusion and data follow different types of logic. This led Toulmin to argue that some features of the form and merit of arguments are *field-invariant* and others are *field-dependent*. Toulmin's work spawned scholarship that both refined and challenged his original ideas. Some have challenged Toulmin's view to suggest that fields emerge around practices, social groups, or fields of discourse in which argumentation is central.

This chapter revisits argument fields theory from a rhetorical perspective and makes the case for an empirical, audience-focused approach that delineates and characterizes the practices and arguments about them that make up argument fields. I provide a sketch of argument fields theory, and then I take up Zarefsky's (2011) suggestion that an empirical approach to argument fields is needed to the further development, and I draw on recent work on empirical material from my interview studies with Danish physicians (Møllebæk and Kaae 2020, 2022) to argue that by taking a more empirically informed approach to argumentation and argument fields we may get a deeper understanding of the differences between fields, of how arguments 'move' between fields, and of how transition from one field to another impacts the evaluation of an argument or a mode of argumentation. In the final section of the chapter I reflect on role of material concerns in argumentation and its implications for argument fields theory.

Rhetorical Argument Fields

The responsibility to develop and decide on public policy is delegated to elected officials who draw on experts for knowledge on the subject matter as well as ways to frame and argue for a policy. After the adoption of the policy, it must be implemented in the real world of public services. It is a given that the institutional setting of policymaking is different from the institutional setting of policy implementation. Argument fields theory explores why some forms of argumentation gain acceptance in some settings (i.e. argument fields) and less so in others. I contend that focusing on the forms of argumentation and the fields that emerged may offer new ways of the understanding how the upstream of policymaking differs from the downstream of policy implementation. Rather than an exhaustive review, this section provides a sketch of the literature on rhetorical argument fields to highlight its potential uses and limitations for research on policy implementation.

Rhetorical approaches to argumentation are characterized by their focus on argumentative practices of social agents in situations marked by uncertainty, and argument fields theory takes aim at the social nature and diversity of these contexts. More specifically, a rhetorical approach to argumentation is socially oriented in the sense that argumentation from this vantage point is always addressing an audience; that they are about possible courses of action (i.e., practice); and it entails expression of values and preferences that may render different arguments incommensurable (Kock 2020). For scholars interested in the everyday practice of argumentation the idea of argument fields support inquiry into the diversity of how argumentation in real-life settings.

Argument fields and the distinction between field-invariant and field-dependent factors of argumentation facilitated the dislodging of a universalist ‘one-size-fits-all’ form of argument analysis. So, instead of asking whether an argument was valid as predicated by the analytical ideal, scholars identifying with rhetorical tradition of argumentation turned their attention to how argumentation unfolded in practice by asking ‘Sound for whom?’ and ‘Sound in

what context?’ (Van Eemeren et al. 2013; Kock 2020). A major part of the attraction of the ‘argument field’ as a concept was its normative potential to stake out middle ground between “the absolutism of formal logic and the implications of vicious relativism” (Zarefsky 1982). The vision was that scholars of argumentation could delineate between different fields of argumentative practices and thereby explore and explain how and why some forms of argumentation proved successful in some contexts but not in others.

While argument fields may have more or less disappeared from journals and conferences on argumentation, the usefulness of argument field theory and related concepts, like argument spheres and argument communities, remains. As James Jasinski notes, rather than a sign of the obsolescence of the concept, the decline in explicit interest in argument fields may indicate that the concept has become ingrained in the disciplinary consciousness for rhetorical scholars to become an almost taken-for-granted component (Jasinski 2001). On a more critical note, Prosis, Miller and Mills argue that while the argument fields have heuristic value for scholars, scholarship in argument fields have not yielded a descriptive or a critical method to support inquiry. This component is crucial, they argue, because any engagement with the diversity of argumentation as it unfolds in everyday practices needs to consensus on nomenclature for students (1996). Reassessing the history of argument fields, Robert Rowland attributes the waning interest in argument fields not to fragmentation, as some have argued, but rather to undue amplification of the diversity of approaches. Rather than mutually exclusive approaches, the different approaches to argument fields demonstrate the multiple aspects to be taken into account and existing theoretical work and the clear relevance for the field invites future collective efforts to continue work on argument fields theory (2008). Rowland provides a useful inventory of the approaches to argument fields:

1. Ontological: *Fields are subject matter domains*
2. Anthropological: *Fields are communities of arguers or*

audiences

3. Linguistic: *Fields are domains of discourse*

a. Epistemological

i. Logical

4. Sociological / Psychological: *Fields are (a) sociological or (b) psychological categories*

a. Disciplinary

b. Symbolic structures

i. Purely psychological

5. Pragmatic: *Fields are practices* (2008)

Nonetheless, the general perception in the discipline is that a central problem has been the unresolved need to define argument fields in a way that accounts for both the internal characteristics of argumentative utterances and the social structures that constrain and afford those utterances. Part of this tension may stem from Toulmin's own shift in the definition of an argument field from being "a logical type" (2003 [1958]) to being a "rational enterprises outside the sphere of natural sciences", i.e., analogous to academic disciplines (Kraus 2011). Foregrounding the propositional content of argumentative utterances, fields organize around the patterns in how discursive agents employ epistemic authority in a social arena. By describing the difference in argumentative content, then, differences between fields emerge. However, critics of this approach have argued that this is likely to lead to little more than idealized typology-building and the kind of formalism that Toulmin's model argumentation originally was a reaction against. And because more formalistic accounts of argumentation tend to disregard more everyday contextual and social aspects of argumentation from view, they are likely to limit the explanatory power of the social factors that initiate and shape argumentation and justification.

The immediate alternative to defining argument fields on the basis of logical types of propositional content is to define argument fields as formally organized arenas or systems of discourse. Much research on argument fields has focused on how “rational enterprises” modeled on academic disciplines are not a good model for real world discourse because they are too formalized to account for dynamics of social spaces. A central issue in this approach is the role of power and epistemic authority. Prosser, Miller and Mills argue that although Toulmin recognized the role of argumentative conflict in establishing authority, his explanation of how argumentation develops and is sustained rests on a evolutionary model which asserts that the best warrant of a field will become the accepted one (1996). However, what constitutes the standard for legitimate argumentation is the object of intense discursive contestation. Symbolic practices of agents invest logical types with authority. Field theory sensitive to social space may describe these practices better.

In sum, the definitional issues confronting arguments fields theory resembles the impasse of the agent-structure binary of much social theory: Whereas a focus on argumentative utterances as logical types tends to overdetermine the agency of the linguistic agent, a contextual focus forms may overdetermine environmental aspects at the expense of the employed strategies. One way forward may be a more empirical approach that emphasizes the practices of arguers. Pointing specifically to the empirical work of van Eemeren, Garssen and Muffles (2009), Zarefsky suggests that “empirical research and analysis of how actual arguers identify and define the argument communities in which they participate” (2011) has driven the research on argument fields forward recently. For Zarefsky, this work demonstrates that the goals and standards of argumentation are upheld in the practice of arguing and, hence, not something that is superimposed retrospectively by argumentation theorists.

A Social Theory of Argument

Charles Willard has put forward a social theory of argument including a perspective on argument fields that is relevant for the purposes of this chapter because it connects relevant issues regarding argumentation, practice and sociality and because it provides a set of operative terms that allows us to empirically articulate the complex social structure of the argumentation in policy implementation. Willard's position departs from approaches based in formal and informal logic in terms of the definition of an argument, the scope of argumentation studies and nature of the social context of arguers. Instead of focusing on arguers' claims and their justification of them, Willard foregrounds the social process of articulating arguments, emphasizing argumentation over arguments. Argumentation is what occurs in situations where people construe "incompatible propositions". Thus, arguments are emergent and contextual; they take place over extended time and place, as arguers collaboratively create, shape, and change events by "interpreting their options and strategically adapting to the expectations and actions of others" (Willard 2003, 67). Therefore, a social theory of argument takes as its object the creation and change of communities of practice that are held together by deliberation and argumentation (Willard 1989). Argument fields, then, are real social entities, and the concept is similar to concepts like 'rhetorical communities', 'domains of objectivity', 'communities of discourse', and 'social frameworks of knowledge', although with notable differences (Willard 2012).

In a "bare-bones sketch" of social theory of arguments Willard (1989) outlined three dimensions. First, a social theory on argumentation seeks to account for the complexity of specific communities of arguers and how that complexity shapes argumentation. Whereas rationalist theory of argumentation seeks to account for "the intellectual progress" in the succession of ideas in a texts and propositions, a social theory emphasizes to a community's "practices and preferences to explain stability and innovation of ideas" (Willard 1989, 161), including the internal

deliberation and ebb and flow of consensus in the field as well as interfield discourse.

Secondly, the object of a social theory of argument is communication modalities, not argumentative propositions. That is, not the expression of communicators' internal states nor the validity of arguments as predicated by normative criteria of argumentation, but rather the modes in which people engage others in justifications about practice. Such a mode of communication may be a *conventional* activity; institutionalized methods for cooperative activity, working agreements and definitions and arguers' ability to create, refine, sustain and contest rules, roles and relations. In this sense, argument fields are not academic disciplines or discourse communities. Rather they are "traditions of practices, inferences we make about recurring themes in a group's practices; they are generalizations we make about unifying threads uniting particular activities" (Willard 2012, 439).

Third, a social theory of argument emphasizes the dynamic between a field's key concepts or epistemic concerns and their utility in specific situations. Around practices emerges a vocabulary and a set of concepts that can make issues practices subject of argumentation. Justification and argumentation are inherently tied to foundational concepts and epistemic concerns. Willard works from the assumption that that social activities are recurring comparison processes in which individuals check their thinking against the views of others. This is key for the epistemic status of ideas because people seek to objectify their thinking by checking it against the standard of a given community or argument field . That is, "a person turns to a field...in order to firm up subjective interpretations. Thus, to study [argument fields] is to study the ways actors deal with the problems of interpersonal relativity, their attempts to wrest order and security from events, their efforts after *objectifying*" (Willard 2012, 440).

The Policymakers: The Argument Field of Regulatory Authorities

The case for this chapter is a form of safety advisory used by medical authorities in the European Union called Direct to Healthcare Professional Communication. It represents a case of how health policy is implemented by health policy makers communicating practice recommendations to health care practitioners, or what we might call policy-adopters. As a type of communication that seeks to change practice, honing in on the argumentation of the letter and the policy-adopters' responses to it allows us to study two argument fields that, on the one hand, can be perceived to belong to the same social system of healthcare (with patient care and public health as their ultimate objectives) but, on the other hand, are also shaped by different professional and epistemic communities with different norms and values of practice, namely in terms of patient care, knowledge production and healthcare governance.

To understand how physicians evaluated the letter and its risk argumentation, we need to understand what they were arguing against, namely the form of argumentation in the drug safety advisories. That is, we need to characterize the argument field of the authorities who distribute it and approximate how they conceptualize this kind of risk communication. Unfortunately, we don't have original empirical data for this approximation but the official EMA guidelines for evaluating drug safety communication and the theoretical models that underpin them may act as a useful proxy source of information.

The social actors involved in the argument field of drug regulation (mainly EU and national authorities and drug manufacturers) operate in a tightly organized social system circumscribed by legal, scientific, commercial, and medical concerns. For example, there are significant legal constraints on what can be included in the safety advisory letter. For example, any mention of therapeutic qualities of the drug in question or mention of other drugs that clinicians could prescribe as

alternatives could be considered advertisement and thus a violation of EU competition law standards. Moreover, the advisory must be based on solid scientific assessment, but it also needs to be timely and respond the potential harm to patients as quickly as possible which ultimately requires regulators to strike a balance between expediency and strength of evidence. The process from detection of potential harm to effective dissemination of a letter may take years. The decision to require a safety advisory is based on extensive data analysis and external review that takes 10.5 months on average (Farcas et al. 2020). When the decision to distribute a safety advisory has been taken, the drug manufacturer and the EMA initiate the often lengthy and legally convoluted process of preparing and phrasing the letter (Boskovic, Møllebæk, and Kaae 2020). After the distribution the manufacturer is required to evaluate the mitigating effect of the letters using surveys that, for example, test how well recipient remember or understand the key messages of the letter (European Medicines Agency 2014). In sum, the multiple counterposing concerns of the EU regulatory system significantly complicates the process developing and articulating argumentation in the letters.

A dominant epistemic concern in the argument field of EU drug regulation is risk. Or more specifically, issues of risk tolerance, responsibility for risk, risk-benefit ratio and so forth. From the perspective of the regulatory authorities, risks are objective, external and unrelated to social processes and thus identifiable, measurable, and controllable objects of intervention and management. And more importantly, risks are tied to individual medicines. That is, a medicine has a risk-benefit profile that is refined continuously through scientific studies, but the risk tolerance of individual patient is not a part of the equation nor is the expected function of the single medicine within an extensive treatment program with multiple medicines. Furthermore, risks are discovered through a scientific process. For instance, surveillance of adverse event reports may have revealed that patients who used a particular an anti-coagulant drug were more prone to serious bleeding in certain situations than what the clinical trial data indicated when the drug was authorized for the market. Once

signals of this new risk are reported and scrutinized through EMA's referral procedure, the new risk are part of objective reality.

Mainly due to the complex governance context of drug safety communication and the prevalence of objectivist notion of risk, the EU regulatory system works with communication as an instrument for behavioral change. Regulators are critically aware that physicians work with patient care as their primary responsibility with notable discretion in decisions about care and prescription of medicines. But there is also an observable expectation that clear argumentation based on recent evidence and instructions on clinical procedures will generate changes in behavior which may, in turn, result in a reduction in adverse reactions to medicine (European Medicines Agency 2014). This expectation is illustrated in the use of the Knowledge-Attitude-Behavior (KAB) (see e.g. (Gridchyna et al. 2014)) communication behavior model that underlies the evaluation methodology that European Medicines Agency advises drug manufactures to use when evaluating whether drug safety advisories have the expected effect (European Medicines Agency 2014). The KAB model sets up a sequential causality relation between its three elements: knowledge, attitude and behavior. The underlying logic is that with the provision of new knowledge, an attitude towards a behavioral change emerges, and from that a behavioral change takes place. The research insight here is that parsing out the steps in which behavioral change occurs allows intervention designers to focus their efforts on specific elements of the process. This model follows a rationalist dictum that places knowledge as a prerequisite of behavioral change, particularly in the case of prescribers' adoption of new drug safety recommendations. However, while the three constructs have arguably been useful in the analysis and evaluation of health communication to wider populations (Marcinkowski and Reid 2019), important aspects are disregarded and undertheorized. 'Knowledge' in this model primarily refers to 'information' or 'evidence' in need of being 'translated' into clinical knowledge, a construct which has been widely criticized in healthcare implementation studies (Greenhalgh and Wieringa 2011). An idealist definition of knowledge risks reducing the complexity of

clinical judgment to algorithmic risk-benefit calculations, despite copious amounts of research demonstrating that physicians rely many forms of knowledge beyond risk analysis and statistical inference (Braude 2009).

In sum, the risk argument field of drug regulation authorities is characterized by the social complexity of developing and articulating argumentation due to counterposing economic and legal concerns, its main epistemic concerns of objective, rationalist risk and the behaviorist communication modality based on the presumption that dissemination of risk information produces risk awareness.

The Target Population: The Argument Field of Clinicians

As mentioned, in their reading aloud of the safety advisories from the drug regulators, the clinicians who received the advisory spoke from a different argument field, and they articulated a different understanding of risk. One of the recurring responses was that the case-letter I showed them (and by extension other safety advisory letters of this kind) was clinically irrelevant. In other words, in the situations where physicians make medical assessments of a patient's condition and prescribe medicines, the information in the letter was unlikely to factor in. The risks to patient safety mentioned in the letter were not something that the physicians were likely to encounter with the patients they see, physicians told me. One physician emphasized that he felt that the risks this letter presented were outside his area of responsibility: "These are all people who have been in contact with the hospital ... I would assume that the responsible specialist made an informed decision about the anticoagulants. I mean, it's not something that we GPs should be juggling with."

In the interview, it became clear that for this physician the main problem with this kind of letter was not merely clinical irrelevance, but the risk of information overload specifically. Receiving what he believed was clinically irrelevant communication increased his awareness of the risk of information overload. The risk was accompanied by a frustration with what was perceived as a completely unrealistic expectation from healthcare policy-makers and healthcare administrators about the level to which physicians

are able to stay up-to-date on recent developments in medicine. Information overload has been a growing concern among clinicians with the emergence of so-called evidence-based medicine (Hall and Walton 2004; Smith 2010), a practice that seeks to incorporate of the best available scientific evidence in clinical decision-making. The effort to bring scientific evidence to clinical decisions have produced an exorbitant number of clinical guidelines for physicians to follow. Moreover, while proponents of evidence-based medicine have emphasized the need for evidence to improve quality, safety and consistency of healthcare delivery (Sackett et al. 1996; Guyatt et al. 1992), critics have worried that practice may be reduced to a ‘cookbook’ medicine by overestimating authorized guidelines and underestimating the importance of tacit clinical knowledge and the importance of individual engagement with the patient (Greenhalgh et al. 2014; Malterud 2002).

Other physicians saw the letter more directly in relation to tensions in the organization of healthcare governance in the era of evidence-based medicine. For example, the first warning in the letter I had the physicians read aloud was that “active clinically significant bleeding” should be considered “a contraindication”, i.e., an indication that should cause the prescriber to stop the use of the medication. In three of the interviews physicians responded very negatively that “active clinically significant bleeding” was so broad a contraindication that it was meaningless in practice. Upon reading it, one physician shook her head.

Interviewer: You are shaking your head?

GP: What is this? Is it bleeding from the gums, when I was brushing my teeth this morning? That is an active bleeding. Is it significant? – How would I know? ... I mean, this is authorities’ crap, right, or academic crap!

The reference to the letter as “authorities’ crap” articulates clearly how knowledge produced centrally in healthcare organizations maybe be evaluated differently at local clinical levels. It is widely established that there is ongoing contestation of the epistemic authority in healthcare governance systems between central, regulatory bodies and local clinical practitioners

(Timmermans and Angell 2001). Despite the epistemic authority of the evidence base behind this warning and the regulatory authority of the EMA which required the company to distribute the letter, three of the physicians are not inclined to accept the claim that patients with “active clinically significant bleeding” should be taken off the drug, because that is clinical judgment call that requires a much more complex assessment of the patients overall condition and medical history.

Rather than an informational capacity issue as noted above, this response captures a physician’s experience of authoritative overreach. It questions healthcare governance and the centralization of epistemic procedures, and it illustrates how the difference in argument fields may revolve around epistemological difference. One physician explained that this is the way ‘the reverse epidemiology’ of general practice works.

You have to remember that in general practice, reverse epidemiology is the rule. Namely that in the hospital they see all these cases, and they say ‘wow, we’re seeing a lot of people with this kind of bleeding’. [In general practice] we don’t see many of them. That all happens centrally and in [patient] registers. We can’t see that people with bleedings are pouring into hospitals, because we see that everything is fine. But if you’re in a hospital, you’re thinking ‘wow, that’s a lot’ because you’re getting cases in from everywhere

We can see how the feeling of authoritative overreach expressed by the first physician may be a result of these epistemological conditions. As Perelman and Olbrechts-Tyteca have argued (1969), adherence to arguments depends of the *presence* of the proposition or issue. That is, the ability of bringing the audience to the point of ‘seeing’ the issue clearly or ‘experiencing’ the proposition as true, is crucial to argumentation. In this case, the inability to ‘see’ the patient who suffers from this adverse drug reaction may reduce the physicians’ sense of urgency regarding the risk.

Rhetoric, Materiality and Policy Implementation

When new policies require on-the-ground practitioners to change their practice, argumentation and justification is a key

concern. Particularly in policy settings that involve health risk and care for citizens, practitioners may have strong expectations for adequate and explicit justifications about the need for changing practice. In this chapter I have approached this issue from argument fields theory by exploring how justification of the policy and its implementation can be considered an argumentative process that unfolds between two argument fields. To get at this issue more empirically, I have taken up the case of a safety advisory from a regulatory authority to healthcare practitioners. But rather than looking at the specific safety advisory text and its argumentation in a rhetorical close reading, I followed the interviewee participants' responses to the advisory and their reflections on whether or not to comply with the safety advisory. That also led me to analyze the conditions for writing and distributing the safety advisory in the first place, namely the institutional constraints and capacities of the issuing authority, the European Medicines Agency. Taking a cue from Willard's social theory of argumentation, I characterized the argument fields more in terms of their practices and the material complexity than reasoning and types of logic. So, rather than focusing on the text I focused on the institutional capacities and arrangements that composed the text and the values and associations that attaches to it.

I found that whereas regulatory authorities consider safety advisories a matter of providing new information to guide physicians' prescription decisions, for the physicians the letter was a persuasive symbolic action that exceeded that of merely providing of new information. For the physicians, the distribution of letter, its style and its argumentation go beyond the risk of the particular drug because it resonated with larger social and political issues sociotechnical system of drug regulation and clinical pharmacology. On the one hand they acknowledged the importance of getting up-to-date information about the safety of the drugs they prescribed, and they acknowledged the need for relying on medical evidence in clinical practice to the greatest extent possible. They believed that their decisions regarding patient health and well-being generally improved when they

incorporated evidence-based guidelines for rational pharmacotherapy. On the other hand, it was also clear to them that the letters were not mere vehicles of risk information. Perhaps unsurprisingly, a key difference to the evaluating of arguments is the proximity to clinical patient care. Primary care physicians provide clinical care for patients directly in clinical settings. Medical authorities, in contrast, are at a remove from clinical care and have administrative responsibilities for healthcare provision, namely the safety, effectiveness and quality of pharmaceutical products.

I think this suggests something important about argument fields theory and especially the relevance it may have for policy analysis and implementation research. Argumentation fields theory presents important ideas to policy analysis to understand the relation between the empirical and the normative, policy and politics, policy judgment and policy narratives (Fischer 2013). However, while aspects related to discourse have long been central in this tradition, the material concerns that go into institutional arrangements and differences in sources of authority sit somewhat uncomfortably in argument fields theory. Some contributions to argument fields theory have indirectly addressed or hinted at questions related to material concerns. For example, Prosis, Miller, and Mills (1996) argue that argument fields constitute arenas of discursive struggle that involve measures of power and authority, but they do not directly consider the material determinants or aspects of such struggles. Relatedly, Zarefsky's response to Kraus's review of argument fields theory and his call for a more empirical approach to argumentation also hints at more direct attention to material concerns, although without specifying so (Zarefsky 2011). Based on the brief sketch of argument fields theory in this chapter I contend that for argument fields theory to shed new light on persistent issues related to the practice of argumentation, such as justification of policy implementation, two further considerations should be made. First, theories of argumentation need to be attuned more to social and practical circumstances of actual argumentation, and secondly, the material

concerns of the argumentative practice should be theorized more explicitly.

While the role of materiality in argumentation may not be a concern in all corners of argumentation studies, it is key concern in research on argumentation in public policy. Robert Asen has suggested that rhetoric is central to the construction of policy problems, to crafting policy solutions and to promoting them to citizens (2010). In an effort to theorize the relation between rhetoric and public policy more explicitly, Asen has characterized public policy as a mediation of rhetorical forces (including argumentation) and material forces. In doing so, he emphasizes the constitutive and performative function of rhetoric, but he also contends that the influence of material factors, policy processes and institutions cannot be excluded from view. That is, a rhetorical account of public policy must exceed a textual, symbolic perspective on rhetoric to include material conditions for rhetorical argumentation. Public policy provides goods and services to specific populations to achieve particular outcomes, and as such it unfolds in the material everyday life of citizens and those who provide public services for them, such as primary care physicians.

Asen's proposition to situate public policy as the mediation of rhetoric and materiality is important because it connects rhetorical theory more explicitly to public policy and calls to further such work. However, in Asen's outline, public policy is understood as something to be decided on and promoted and thus closely tied to policymaking and the realm of politics. That is, Asen primarily explores public policy and rhetoric as an interface between government-based policymaking and the citizenry. However, although public policy includes both government institutions with mandates to make decisions and the citizenry at large, the life cycle of a public policy is crowded with many more communities and perspectives, including policy-adopters, independent policy experts, commercial beneficiaries of policy and civil beneficiaries of policies etc. My focus in this chapter has been on the downstream process of implementing what has been decided. Despite the unresolved questions noted above, argument fields theory provides a valuable literature to further investigations into the

nature and variety of communities involved in the policy life cycle because argument communities are likely to form around policymaking or be subject to implementing processes. I consider Willard's point that arguers collaboratively create, shape, and change events by "interpreting their options and strategically adapting to the expectations and actions of others" (Willard 2012) a useful starting point for thinking further about rhetorical argumentation and policy implementation.

Although Asen connects public policy to both the constitutive and material dimensions of rhetoric and argumentation, the discussion does not extend to the material concerns that emerge when the rubber of policy meets the road of real-life settings. How, then, do we account for the material concerns and affordances of policy implementation that were described in the case study above? In rhetorical theory, the term 'materialist rhetoric' refers to a variety of different theoretical accounts of the relationship between rhetoric and the world that it inhabits, and this has animated lively debates in the rhetorical studies for over four decades (McCann 2018). These debates take up core theoretical questions like whether rhetoric is representational or constitutive, what characterizes the material world external to rhetoric, and what characterizes rhetorical agency? While Marxism has been the most influential intellectual tradition in these debates, approaches from other intellectual traditions have also emerged. These approaches generally reject the claim that materiality of rhetoric is limited to antagonistic class relations by arguing that rhetorical materiality takes up every dimension of human affairs.

Specifically, Greene and Hayes' offer a rhetorical materialist perspective on argumentation that disregards the notion of argumentation as the symbolic means by which people influence other people's beliefs, values and action (2012). The rhetorical materialist perspective they advance approaches argumentation less as a representational act of reasoning and more as a socially productive and contingent "human technology" (2012, 191). Argument is socially productive in the sense that argumentation gives shape to communities of arguers (similar to Willard's claims above). But more importantly argument is also socially productive

as a form of communicative labor. One of the main accounts of communicative labor is the need to manage disagreement, contention, and difference, also in public policy and in more technical spheres of argument. However, predominant ‘dialogical’ theories of argumentation imply a cognitive division of labor in which the labor of persuasion is assigned to the speaker (in the form of argument production) and the labor of becoming informed is assigned to the audience (in the form of argument evaluation). In other words, ‘dialogical’ theories of rhetorical argumentation posit the speaker as the producer of arguments designed to persuade an audience, counter objections, and to some extent justify decisions. A rhetorically materialist perspective, alternatively, frames all components of the rhetorical context (speaker, text, audience, exigence, change) as socially relevant. That is, argumentation participates in “a material constitutive process of world making” by composing these elements as an argumentative context (2012, 191). One significant implication is that any purpose or intention that is inferred from an argument is thus socially produced by a argumentative context and not a property of the argument producer.

Greene and Hayes provide new perspectives on what I characterized as a theoretical impasse for argument fields theory above, although their critique of dialogical theories of argument does not fit squarely on argument fields theory. Argument fields theory (in the multiple variations I have noted above) does not posit a cognitive division of labor between argument production and argument evaluation. Rather, argument fields theory, broadly speaking, emerged out of the recognition that multiple communities of arguers produce and evaluate arguments in distinct, incommensurable ways. Nonetheless, the bifurcation of argument production and argument evaluation is an attribute of much of the argument fields literature.

A rhetorically materialist approach to the relation between argument fields as a product of argumentative labor opens new perspectives on the social process of argumentation and the institutional arrangements and capacities that shape it. Recognizing that rhetorical agency should not be limited to the

argumentative context but also include material constitutive dimension may bring into focus institutional arrangements and capacities that characterize the argumentation within an argument field. For example, while medical authorities issue safety warnings on the basis of their legal and scientific authority, policy-adopters should not be conceived as passive recipients. Policy-adopters such as healthcare professionals may hold significant informal authority due to their ethos as on-the-ground practitioners and their capacity of organization. That is, while the medical practitioners may be considered passive recipients of safety advisories, they have considerable rhetorical agency in circulating arguments about clinical practice within their community. My research suggests that clinical guidelines developed by medical professionals themselves carry more argumentative weight in some aspects of clinical decision-making than policies from the medical authorities (Møllebæk and Kaae 2022). Thus, the distinct organization of internal policy in the healthcare professional communities and the institutional arrangement that support justifications and decisions are important determinants of the argument field.

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