

Sept. 15, 2022

Director Shalanda Young
U.S. Office of Management and Budget
725 17th St., NW
Washington, DC 20503

CC: Acting Administrator Dom Mancini, U.S. Office of Information and Regulatory Affairs
Associate Administrator Sabeel Rahman, U.S. Office of Information and Regulatory Affairs

Re: Implementation of Jan. 20, 2021, Memorandum on Modernizing Regulatory Review

Dear Director Young:

The Coalition for Sensible Safeguards (CSS) – a diverse group of more than 150 organizations representing millions of Americans that support strong and effective regulations to protect the public – strongly urges the Biden administration to prioritize implementation of the pending reforms signaled in the Memorandum on Modernizing Regulatory Review.

CSS applauds the Biden administration for making significant progress on its ambitious regulatory agenda to protect consumers, workers, public health, and the environment, empower marginalized communities, and enable swift action to address the climate crisis. Yet, there is much more to be done.

The U.S. Office of Information and Regulatory Affairs (OIRA) regulatory review process has often served as a barrier to, rather than as a catalyst for, regulations that are designed to protect the public. Indeed, as the Modernizing Regulatory Review memo points out, the current approach to regulatory review:

- Disregards important values like human dignity, equity, and the interests of future generations;
- Fails to account for a wide range of regulatory benefits and is insufficiently attentive to distributional concerns, thus inappropriately burdening disadvantaged or marginalized communities;
- Discourages stronger protections instead of proactively promoting them;
- Imposes costly delays; and
- Is marked by a lack of basic transparency that is necessary for upholding the democratic values this administration champions.

CSS strongly agrees with the need outlined by the administration for fundamental reforms to the OIRA regulatory review process. Not only are reforms to address such flaws long overdue; they will enhance the quality and timeliness of the administration's regulatory decision-making and ensure that the OIRA review process advances regulatory policies that improve the lives of the American people. With the recent passage of the Inflation Reduction Act, and a robust agenda of new regulatory protections for the American people, reforms to improve, strengthen, and make the regulatory process more equitable and effective are urgently needed.

It is imperative that the Biden administration make implementation of the reforms under the Modernizing Regulatory Review memo a top priority to be completed within this Congress.

The Biden administration has a historic opportunity to rebuild the regulatory system to protect the American people. We look forward to working with the administration to implement this significant priority, and to do so expeditiously, so future public protections are not delayed.

Sincerely,

Robert Weissman
President, Public Citizen
CSS Co-Chair

Susan Weinstock
CEO, Consumer Federation of America
CSS Co-Chair