



July 21, 2026

Representative James Comer
Chairman, House Oversight Committee
2157 Rayburn House Office Building
Washington, DC 20515

Representative Robert Garcia
Ranking Member, House Oversight Committee
2157 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Comer and Ranking Member Garcia:

The [Coalition for Sensible Safeguards](#) (CSS), an alliance of over 220 labor, scientific, research, good government, faith, community, health, environmental, and public interest organizations that represents millions of Americans and advocates for effective regulations to protect the public, strongly opposes the Comment Integrity and Management Act of 2026, H.R. 9643, which will be considered by the Committee on July 22, 2026.

The bill minimizes the importance of meaningful participation in guiding agency decision-making throughout the regulatory process. Implementation of robust regulatory safeguards is critical to protecting consumers, workers, the environment, and public health and safety. Public participation in the rulemaking process, whether through individual comments or mass comments, is not only essential to democracy, but also an important way to ensure that individuals affected by regulations can make their voices heard about the impacts of regulations on their communities.

While the bill contains a few unobjectionable provisions, these are combined with others that would empower the U.S. Office of Management and Budget (OMB) to improperly limit consideration of legitimate public comments. On the whole, this bill would not meaningfully improve protections for the American public.

Specifically, certain provisions of the bill address the very real problem of public participation in rulemaking. For example, CSS generally supports the bill's requirement for OMB to issue guidance to agencies on how to use new technology to offer new opportunities for public participation.

However, the Trump administration has sought to broadly use exemptions and shortcuts to exclude rules from notice-and-comment requirements and has dismantled an important technological feature that allowed automated submission of mass comments to [Regulations.gov](https://www.regulations.gov). Additional rapid developments in AI technology and its use have rendered the bill's current language unclear and overbroad.

Mass Comments

Mass comments are a critical avenue for members of the public, particularly those who benefit most from new regulatory protections and live in historically marginalized communities, to participate in the rulemaking process. Mass comments are used by all stakeholders, both those supportive and critical of rules. Mass comments can help to balance influence from corporations and regulated entities that dominate the rulemaking process. By bringing underrepresented voices forward in consensus, mass comments ensure agencies hear from more than regulated entities before making vital decisions.

CSS supports Section 2 of the Comment Integrity and Management Act, which clarifies that the bill “should in no way be understood to discourage mass comments, which are a vital part of the regulatory process.”

However, to preserve the integrity of mass comments, the bill [must reverse the decision](#) by the General Services Administration (GSA) to disable the use of POST-API, which effectively prevents the public from submitting mass comments to federal agencies on pending rulemakings.

GSA launched the POST API tool in accordance with the E-Government Act of 2002 to ensure that consumers, workers, and all individuals from across the United States are able to effectively participate in the federal regulatory process and have their voices heard. The POST API feature enhanced public engagement by enabling entities to solicit public comments through a website or email and submit those comments to the relevant agency, without the individual commenter needing to go directly to [Regulations.gov](https://www.regulations.gov).

We are deeply concerned that by including provisions applying to mass comments without addressing the current limitations imposed by the Trump administration, consideration of mass comments will be limited. Limiting mass comments could result in agencies losing a critical perspective in the development of rules.

Computer-Generated Comments

CSS is also concerned that this bill fails to distinguish between legitimate comments submitted by or on behalf of a human author or signer using computer software or AI and fraudulent comments autonomously generated by AI. Conflating these two types of comments could lead to agencies establishing policies that treat them similarly when they are very different. Legitimate comments should receive proper consideration, and fraudulent comments should receive none.

To ensure this legislation focuses solely on autonomously generated comments, the bill should include clarifying language to the definition of “computer-generated comments.” Additionally, Section 2 should be revised to clarify that the bill does not discourage comments submitted by or with approval of a human author or signer of the comment. With the rapid development of AI, individuals are likely to look to AI for help with drafting and editing comments submitted to agencies, particularly individuals who have not historically participated in the rulemaking process. Although not all may agree about the wisdom of that approach, legitimate comments reviewed and submitted by human beings should always be accepted and meaningfully considered by agencies.

OMB Guidance and Agency Policy

As agencies assess and develop policies for managing electronic comments, it is imperative that they do not limit or exclude consideration of comments submitted by or with approval of a human author or signer, whether submitted individually or as part of a mass comment. However, given the current administration’s multiple attacks on notice-and-comment requirements, CSS requests that the legislation be revised to ensure OMB and other political agency heads do not weaponize its provisions. Thus, the bill should make clear that it does not authorize OMB guidance or other agency policies to restrict legitimate comments.

Conclusion

CSS urges the House Oversight Committee to oppose the Comment Integrity and Management Act of 2026, H.R.9643. CSS encourages the Committee to evaluate proposals that offer real and meaningful reforms to strengthen the regulatory process, such as [H.R. 6145](#), the [EXPERTS Act](#). We look forward to assisting the Committee in ensuring our regulatory process is working effectively and efficiently to protect the American public.

We strongly urge you to oppose H.R. 9643.

Sincerely,

A handwritten signature in black ink that reads "Rachel Weintraub". The signature is fluid and cursive, with a long horizontal stroke at the end.

Rachel Weintraub
Executive Director
Coalition for Sensible Safeguards

Cc: Members of the House Oversight Committee