



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

Representative Gerald E. Connolly
Ranking Member, House Oversight Committee
2157 Rayburn House Office Building
Washington, DC 20515

May 20, 2025

Dear Chairman Comer and Ranking Member Connolly:

The [Coalition for Sensible Safeguards](#) (CSS), an alliance of over 200 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 Modernizing Retrospective Regulatory Review Act, H.R. 67, which will be considered by the Committee this week.

This bill minimizes the importance of effective regulation and meaningful participation in the regulatory process. The implementation of strong and robust regulatory safeguards is critical to protecting consumers, workers, the environment, and public health and safety. Public participation in the rulemaking process is not only essential to democracy but an important way to ensure that individuals affected by regulations can make their voices heard about the impacts of regulations to their communities. These bills, while purporting to modernize retrospective review and adding technological tools to assess mass comments, would do nothing to improve protections for the American public. Instead, they would condition unobjectionable provisions with other provisions that would discourage public participation and unnecessarily expand retrospective review.

The Modernizing Retrospective Regulatory Review Act, H.R. 67, contains provisions that go beyond the stated intent of the bill, which is to incorporate use of new technology such as artificial intelligence in existing agency retrospective review processes. The bill would result in the expansion of such retrospective review beyond what is already required by law. Specifically, the bill creates new requirements for retrospective review plans, with vague or insufficient definitions. Sections (c) and (d) of the bill would effectively provide any agency head with new and open-ended authority to mandate a retrospective review of any regulation the agency head chooses, rather than only those regulations that are subject to retrospective review under current

law. This would be time-consuming for agencies and could deplete the resources they need for their regulatory priorities, especially since many of these agencies are critically underfunded.

This bill should focus on technologies that improve retrospective reviews already required under current statutory authorities, rather than serve as a vehicle to significantly expand the number of retrospective reviews agencies are required to do. If this bill was truly focused on simplifying regulatory review by encouraging the use of more technology-friendly formats (as in sections (a) and (b) of the bill), then sections (c) and (d) would not be necessary. Making matters worse, the bill imposes a one-sided focus on retrospective review that encourages agencies to make changes that weaken such regulations to reduce burdens on regulated entities rather than strengthen regulations to more effectively protect the public from harm.

CSS urges the House Oversight Committee to oppose the Modernizing Retrospective Regulatory Review Act, H.R. 67, and encourages the Committee to evaluate proposals that offer real and meaningful reforms to strengthen the regulatory process, such as the “Stop Corporate Capture 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. 67.

Sincerely,

A handwritten signature in black ink that reads "Rachel Weintraub". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Rachel Weintraub
Executive Director
Coalition for Sensible Safeguards

Cc: Members of the House Oversight Committee