

Echols, Mabel E.

From:
Sent: Tuesday, March 31, 2009 5:04 P.M.
To: FN-OMB-OIRA-Submission
Subject: Request for comment

Dear Mr. Neyland,

This letter is in response to your request for comments regarding recommendations to the President for a revision of the Federal regulatory review process.

I appreciate the essential role that OIRA plays in reviewing new regulations. However, I would like to see increased transparency of conflicts of interest and a complete abandonment of cost-benefit analysis.

Transparency:

Although scientific advisors are typically required to disclose their relationships with industry, it is rarely known what the nature of those relationships entail, although they may vary by several orders of magnitude. All interested parties advising on regulation should not only disclose their relationships but also detailed accounts of remuneration should be easily accessible by the public. One would consider the advice of someone who had received \$100 from an interested party very differently from one who had received \$100,000. This policy should be considered for every federal agency. For example, the advisory committees to the FDA are frequently populated by physicians with significant ties to industry.

Cost Benefit Analysis:

Cost-benefit analysis is rarely rooted in fact, easily manipulated and often quoted. OIRA would better serve the public interest by compiling rigorous economic impact assessments to enable planning and serve as a reality check. Quantifying benefits is much too subjective to be weighed against costs that can be objectively analyzed. If the science supports the need for regulation, the benefits are obvious. At that point we only need to know what it will cost.

Respectfully yours,

Lynn Barr
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