Hi there,

I’m writing to submit feedback on “Broadening Public Engagement in the Federal Regulatory Process”. I am very supportive of this goal, and my comments are entirely in the spirit of how to successfully increase participation among people who bring important expertise to rules, but whose expertise may not always be socially recognized by others and/or may not see themselves as having expertise in federal rule-making.

My comments are based on my experience engaging with nonprofit organizations who are also trying to broaden public participation in regulatory processes (e.g. to broaden participation in response to new environmental regulations) as well as my experience working with nonprofits who train people in citizen advocacy. In short, I’ve seen firsthand many of the hesitations that arise when people think about engaging in ways they haven’t done before.

Based on this, my main recommendation is that the guidance needs to go further to emphasize ways that agencies can make members of the public feel comfortable with and motivated to engage in the process. It’s not enough to invite members of the public to reach out to the agency with questions (or even to attend a community meeting), as many will be hesitant about what the experience will be like. They will be hesitant about whether they can reach out if they do not have a well-formed question, but instead just a broad concern or experience to share. Or they may be hesitant about whether their expertise on the issue will be valued during a meeting, or by someone who picks up the phone.

So, the guidance needs to encourage agencies to explicitly acknowledge that it’s ok to reach out to them in advance of submitting comments even if you don’t have a well-formed question but just want general feedback, or if you’re uncertain if the evidence you have is clear enough, or if it’s ok to only include personal stories, and so on.

In addition, the idea of contacting a government agency will seem intimidating to many (Will I need to share lots of personal information? Will the person be friendly? Will the person think I’m stupid?), and so the guidance should try to allay these concerns as much as possible. It should be explicit about relationality — how the person who answers the phone or email will explicitly relate to them, and how they can relate to that person. Or, put differently, what will the interaction actually be like?

All of this speaks primarily to question #3, and in particular focuses on new tools/guidance that I think would be helpful. Lastly, all of this means that the agencies need to make space for members of the public to interact one-on-one with agency officials in advance of submitting comments. This goes beyond “outreach to communities and stakeholders” in general, but instead entails having people who are willing to engage collaboratively with members of the public who have questions and need feedback/guidance before submitting their official comments.

Best wishes,

Adam Levine

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