Hello,

Thank you for the opportunity to provide feedback on the critical processes that underlie Federal Regulations and Rulemaking. My name is John Herlihy. I am writing as a member of the public, although I am currently AAAS Science and Technology Policy Fellow working at a regulatory agency within the USDA.

I applaud OMB's work to involve the public in the rulemaking process. I will admit that I knew next to nothing about the process before I began work at USDA. The action items under "Summary of Learnings and Recommendations", including the outreach materials and examples will be a great step towards helping the public understand.

My recommendation relates to your question two (obstacles or barriers to greater public participation). I have seen that it is easy for regulatory agencies to interface with trade groups and industry, and to some extent with consumer advocacy groups. However, it is difficult to get feedback from the general public. A major barrier is the requirement for formal Information Collection Activity when asking the public for feedback outside the rulemaking process. While lobbyists and trade activists have a DC office or can hop on a plane, the general public relies on written or digital communication with these agencies. If surveying and interviewing the public could be done with less of a burden, this type of communication would happen more often. I still believe that OMB needs to know about such interactions, but the full Information Collection application is too burdensome. Perhaps a middle ground that requires less work from already overburdened regulatory agencies. This would allow agencies to inform OMB of the proposed interaction more quickly and facilitate more dialogues of this type with the public.

Thanks again for working on this important issue, and giving me the opportunity to comment.

Best, John Herlihy