A few points I would like to make regarding enhanced public participation into the regulatory process.  While this is on the surface a nice idea, the problems are in the details of how this occurs.  Many a good idea falls apart in the execution phase.

1. Will agencies abandon the practice of using short docket periods for some regulatory comment periods?  This seems to occur more with some comments than others, leading many of us to believe there are times the agency in question does NOT want comments and is seeking to avoid them.
2. One comment on the proposed processes is simplifying language.  While a nice goal, how can the public be sure that the individual in charge of paraphrasing is doing this accurately and without injecting bias?  This seems a huge risk that negative consequences could be downplayed, positive and hoped for outcomes emphasized, etc.
3. On the aspect of “going to the underserved community”-  will this be at the expense of other communities impacted by new or revised regulation?  Understanding that resources will be limited, it is not unreasonable to think that efforts extended in one area will cost another area.
4. Foreign nationals should not be allowed to comment on US regulations or process, period, regardless of their legal status.  They are not voters or citizens.  How will you approach this in terms of who is legitimately allowed to comment on items of US law/regs?
5. How will you seek to communicate or even identify items that could be side effects or unintended consequences of a regulatory change?  As an experienced reviewer of docket items and regulation, it’s apparent to me that there are very frequently consequences to the regulated community that are either not identified, not considered, or considered and not communicated.  It is up to us to be astute and knowledgeable enough to call those out in comments.

Thank you for the opportunity to comment.  Please note that these comments are entirely my own, and do not reflect any opinion or position of my employer.

Donna Clemons, DVM