



May 17, 2018

The Honorable E. Scott Pruitt
Administrator
Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 02460

Re: Comment period extension request for proposed rulemaking—Strengthening Transparency in Regulatory Science- Docket ID No. EPA-HQ-OA-2018-0259

Dear Administrator Pruitt:

The Association of American Universities, representing 60 leading U.S. research institutions, respectfully requests that the Environmental Protection Agency extend the comment period for the above-referenced rule to sixty (60) days. The current comment period of thirty (30) days is inadequate. This abbreviated comment period hampers our ability to obtain the feedback from our member universities that we need to thoughtfully assess the rule and develop detailed comments on it for your consideration.

As published in the Federal Register on April 30, 2018, the proposed rule significantly changes the rulemaking process at the Agency and, as a result, could impact the scientific research that underpins environmental and public health policy in potentially adverse and unintended ways. Given the complexity of the proposed rule, universities, university researchers, and other relevant stakeholders need sufficient time to examine it, respond thoroughly to the posed questions, and provide the Agency with constructive comments.

Previously, the federal government has given the public more time to respond to proposed changes in data transparency policies. For example, the Office of Management and Budget opened the public comment period for sixty (60) days when proposing changes to OMB Circular A-110, which requires data from federally funded research to be available to the public through the Freedom of Information Act (FOIA) processes.¹ Moreover, Executive Order 13563 recommends a comment period of “at least 60 days” to ensure adequate public participation in the regulatory process.²

¹ Office of Management and Budget, “OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Non-Profit Organizations,” Proposed Revision, Federal Register, 64, no. 23 (February 4, 1999): 5684-5685.

² Exec. Order No. 13563, Federal Register, 76, no. 14 (Jan. 18, 2011): 3821.

The public comment period is a critical part of the rulemaking process and provides federal agencies with the information necessary to carefully assess the need for policy change, as well as to closely examine and better understand potential implementation plans and impacts. This process should not be cut short or undermined. Accordingly, we strongly urge you to extend the comment period to sixty (60) days.

Thank you for considering this request.

Sincerely,

A handwritten signature in cursive script that reads "Mary Sue Coleman".

Mary Sue Coleman
President