July 18, 2018

Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Strengthening Transparency in Regulatory Science (Docket ID No. EPA-HQ-OA-2018-0259)

Dear Administrator Wheeler,

On behalf of Research!America, the nation’s largest nonprofit alliance committed to advancing medical progress and strengthening our nation’s public health system, I am writing in response to the proposed rule for Strengthening Transparency in Regulatory Science. We appreciate the importance of transparency, accountability, and integrity in EPA decision-making, and are grateful for this opportunity to provide input.

On July 16, 2018, the National Academies of Sciences, Engineering and Medicine issued a formal response to the proposed rule. Research!America highly respects the Academies’ role as a trusted source of dispassionate advice on the conduct and application of science, and our alliance associates itself with the comments the Academies submitted. In particular, we agree with the Academies that rather than making discrete adjustments to this rule, EPA should take a step back and assure its approach to advancing transparency serves the best interests of the American people.

We recognize that simultaneously advancing transparency, comprehensiveness, privacy and rigor is a challenging task. Fortunately, the American people’s preferences suggest that the agency would be taking the right path by devoting more time to preventing the inadvertent weakening of EPA regulatory decision-making. Research!America has commissioned national surveys on science-relevant topics for nearly 30 years, and a strong majority of Americans across the political and ideological spectrum agree that public policies should be based on the best available science. In that context, it is crucially important that EPA heed concerns that the proposed rule would degrade the knowledge base upon which EPA makes determinations pivotal to the environmental, health and economic interests of the United States.
Research!America stands ready to work with you to re-envision EPA’s transparency policy in a manner that safeguards the integrity of regulatory decision-making, fosters transparency, protects privacy, and honors the contributions Americans have made, and will continue to make, to policymaking by lending their data to research. Thank you for your efforts and consideration.

Sincerely,

Mary Woolley
President and CEO