



FASEB

Federation of American Societies
for Experimental Biology

Representing Over 115,000 Researchers

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FASEB Comments in Response to Office of Information and Regulatory Affairs Request for Feedback on Broadening Engagement in the Federal Regulatory Process

Comments transmitted electronically via email to publicparticipation@omb.eop.gov on March 3, 2023

The Federation of American Societies for Experimental Biology (FASEB) appreciates the efforts of the Office of Information and Regulatory Affairs (OIRA) within the Office of Management and Budget to solicit feedback on its [recommendations](#) to broaden public engagement in the federal regulatory process as published on February 14, 2023. As a coalition of 27 scientific societies representing over 115,000 individual researchers actively engaged in biological and biomedical research, FASEB is fully aware of the importance of stakeholder engagement in the decision making process and supports efforts to make the policy making and regulatory processes more accessible.

The proposed recommendations for broadening engagement in the federal regulatory process echo FASEB's recent comments to the White House Office of Science & Technology Policy's Scientific Integrity Fast-Track Action Committee in [August 2021](#) and [April 2022](#), namely broader communication of proposed regulatory actions through a variety of communications channels, offering a variety of channels through which stakeholders can submit feedback on proposed regulatory actions, and ensuring sufficient time for stakeholders to prepare and submit comments. With this prior input in mind, FASEB agrees with the three strategies identified through the 2022 listening sessions.

Our current comments focus on the fourth question posed in the current call for comments, "*How can intermediaries – such as trade associations or coalitions – be helpful in reaching individuals or small businesses, where have they been successful in doing so, and where might they be insufficient?*" In short, professional and trade associations and related coalitions can be a huge asset to expanding the reach of the federal government and obtaining stakeholder feedback on the regulatory process. As noted in the opening paragraph, FASEB is a coalition of 27 scientific societies. As such, we have adopted a variety of strategies to engage our extensive volunteer network to provide feedback on policy and regulatory actions proposed by agencies of interest to our members. In many cases, these efforts are further amplified by individual member societies.

Similarly, vehicles like FASEB's [Washington Update](#) – a biweekly newsletter highlighting policy and legislative activities of interest to the broader FASEB community – highlights opportunities for stakeholder engagement as well as FASEB responses to recent calls for comment. This latter point highlights the ability of professional societies to identify policy and regulatory items of interest from formal documentation, such as the *Federal Register*, and increase community awareness of a proposed action or other opportunities to provide feedback.

Full members: The American Physiological Society • American Society for Biochemistry and Molecular Biology • American Society for Pharmacology and Experimental Therapeutics • American Society for Investigative Pathology • The American Association of Immunologists • American Association for Anatomy • Society for Developmental Biology • Association of Biomolecular Resource Facilities • The American Society for Bone and Mineral Research • American Society for Clinical Investigation • Society for the Study of Reproduction • The Endocrine Society • American College of Sports Medicine • Genetics Society of America • The Histochemical Society • Society for Glycobiology • Association for Molecular Pathology • Society for Redox Biology and Medicine • Society For Experimental Biology and Medicine • American Aging Association • Society of Toxicology • Society for Leukocyte Biology • American Federation for Medical Research • Environmental Mutagenesis and Genomics Society • Shock Society • **Associate members:** The American Society of Human Genetics • The Society for Birth Defects Research & Prevention • American Society for Nutrition

As OIRA continues its efforts to broaden public engagement in the federal regulatory process, FASEB strongly urges attention to the format for information collection as well as the timeline for accepting comments. Similar to the U.S. government, organizations like FASEB typically have robust processes for developing and transmitting comments in response to requests for information or notices of proposed rulemaking. Depending on the topic and the governance process for a particular organization, the minimum time necessary to develop meaningful feedback can range from 45 to 60 days. In [March 2018](#), FASEB highlighted its concerns about increasingly truncated response times in a letter to National of Institutes of Health leadership. In response, the agency has since extended the comment period for most of its requests for information to be a minimum of 60 days. Unfortunately, a similar practice has not been adopted by key offices within the Executive Office of the President, with many calls for comments (including this one) having comment periods of 30 days or less. These timelines are challenging for those of us already actively engaged in policy and regulatory making processes; imagine how daunting it must be for individuals or organizations who are not familiar to the process or have limited resources.