

Center for Regulatory Effectiveness

1601 Connecticut Avenue, NW
Washington, DC 20009
October 4, 2022

The Honorable Cecilla Rouse
Chair, Council of Economic Advisers
Eisenhower Executive Office Building
17th and Pennsylvania, Ave. N. W.
Room 468
Washington, DC 20502

Re: Equity Considerations in Rulemaking

Dr. Rouse:

I am writing you to call to your attention to the fact that this is the ideal time for your office to become involved in establishing the principles and methodologies to address equity considerations in the rulemaking process. I arrive at this conclusion because:

- (1) the President has issued an executive order which requires the aforementioned action
- (2) it is the midterm of the Administration and relevant personnel are either onboard or soon to be, and
- (3) failure to act immediately could foreclose on the first real opportunity to address equity considerations in the past fifty years.

In addressing this matter, it is imperative that economists exercise a dominant role. As you are aware, your office was established to ensure the prominence of the economic community in economic issues.

In order to facilitate the Administration's review of this matter, the Center for Regulatory Effectiveness, under the auspices of a discussion forum included in the 2021 proceedings of the Society for Benefit-Cost Analysis, led a discussion of experts involved in addressing equity considerations in the rulemaking process. CRE has written its understanding of the recommendations reached at the discussion forum, a copy of which is attached hereto.

We look forward to your exercising a leadership role in this activity.

Respectfully,

Jim Tozzi
Center for Regulatory Effectiveness