

Who coined the term centralized regulatory review?

The term “**centralized regulatory review**” (CRR) does **not have a single clearly documented “coiner”** in the way some policy terms do. However, the concept—and much of the terminology surrounding it—emerged from a specific institutional and intellectual lineage tied to the development of White House regulatory oversight.

1. Core Origin of the Concept (1970s–early 1980s)

The idea of centralized review of agency regulations predates the phrase itself and developed through:

- James T. Tozzi – often regarded as a principal architect of the system inside the Office of Management and Budget (OMB)
- Office of Management and Budget – where early review mechanisms were institutionalized
- Office of Information and Regulatory Affairs – created by the Paperwork Reduction Act of 1980

Before the phrase “centralized regulatory review” was widely used, the practice was described more functionally:

- “White House review of regulations”
- “OMB clearance”
- “regulatory oversight”

2. Emergence of the Phrase (1980s–1990s academic/legal usage)

The **actual phrase “centralized regulatory review”** appears to have been formalized later, primarily in:

- administrative law scholarship
- retrospective analyses of the Reagan-era regulatory program (e.g., Executive Order 12291)

Key figures who helped **popularize or standardize the term** in writing include:

- Sally Katzen
- Cass Sunstein
- Susan Dudley

These authors used “centralized regulatory review” descriptively to characterize a system that had already been built.

3. Bottom line on “who coined it”

- **No definitive evidence** shows that any single individual formally *coined* the exact phrase.
- **James T. Tozzi** is widely viewed as a **key architect of the underlying system**, but not definitively the linguistic originator of the term.
- The phrase itself appears to be an **ex post academic label** that gained traction in the **late 1980s–1990s**.

4. Practical interpretation

In policy history terms:

- **Tozzi** → **built the machinery**
- **OIRA** → **institutionalized it**
- **Legal scholars** → **named and formalized it as “centralized regulatory review”**