

COUNCIL OF ECONOMIC ADVISERS  
WASHINGTON

CHARLES L. SCHULTZE, CHAIRMAN  
GEORGE C. EADS  
LYLE E. GRAMLEY

October 17, 1979

MEMORANDUM TO REGULATORY ANALYSIS REVIEW GROUP PARTICIPANTS

FROM: GEORGE EADS *GE*  
SUBJECT: EXECUTIVE COMMITTEE MEMBERSHIP

The rotating terms of Commerce and HEW membership on the RARG Executive Committee have expired. The new members, chosen by random selection, are Labor (as the "economic" agency) and EPA (the "regulatory" agency). Their terms will expire March 31, 1980.

I attach a copy of RARG procedures and contact list for your reference. Please advise Tom Hopkins at CWPS (456-7995) of any changes in your agency's RARG representatives.

Attachments

PROCEDURES OF THE REGULATORY ANALYSIS REVIEW GROUP

Regulatory Analyses required by Executive Order 12044 are made available in draft form for public comment when the corresponding regulatory proposals are first published in the Federal Register. A limited number of these Regulatory Analyses also are reviewed by an interagency Regulatory Analysis Review Group set up by Presidential directive to complement the Executive Order in stimulating improved regulations.

The Regulatory Analysis Review Group is chaired by the Council of Economic Advisers (CEA) and has as members the principal economic and regulatory agencies of the Executive branch. <sup>1/</sup> A four-member Executive Committee (CEA, the Office of Management and Budget, and two rotating members serving six month terms, one an economic and one a regulatory member) is responsible for selecting ten to twenty Regulatory Analyses per year (with no more than four from any one agency) for full Review Group attention. The reasons for selecting a Regulatory Analysis can reflect a variety of considerations, but in general the following criteria seem dominant:

- o large total cost -- relative to other regulations being proposed by that same agency within a year or so, the total burden associated with compliance (including capital outlays, operating and maintenance costs, government expense, etc.) is substantial; and in absolute terms, this total cost exceeds \$100 million in any one year.
- o large sectoral impact -- overall costs or average prices for some industry, level of government or geographic region would increase by a substantial percentage, perhaps 3 percent or more, as a result of compliance, and this percentage is large relative to that associated with other regulations being proposed by that same agency within a year or so.
- o deficient Regulatory Analysis -- incomplete or inadequate analysis particularly with respect to alternatives, costs or benefits.
- o precedential importance -- the regulation sets a noteworthy precedent that will influence subsequent rulemakings.

<sup>1/</sup> Economic members include Council of Economic Advisers, Office of Management and Budget, and the Departments of Commerce, Labor, and Treasury. Regulatory members include Departments of Agriculture, Energy, Health Education and Welfare, Housing and Urban Development, Interior, Justice, Transportation and the Environmental Protection Agency. Other participants include the Office of Science and Technology Policy as a member and the Domestic Policy Staff and the Council on Environmental Quality as advisers.

- o broad policy issues -- the regulation raises important methodological or other broad questions encountered in a variety of rulemakings.

Analytical staff support for the Review Group is provided by the Council on Wage and Price Stability (CWPS). CWPS has statutory authority to intervene on its own behalf in regulatory proceedings, and from time to time CWPS on its own initiative elects to comment publicly upon certain proposed regulations. However, for proposals which are selected for Review Group action, CWPS has agreed to participate in the proceedings on behalf of the Review Group and not separately on its own behalf.

In order to avoid delaying regulations, Review Group action occurs during the public comment period following publication of a Notice of Proposed Rulemaking. Review Group procedures are outlined below.

- o When an agency publishes a Notice of Proposed Rulemaking (NPRM) for a major regulation, it sends the summary of the proposal to the Review Group so that any agency with an interest in the economic impact of the proposal is promptly informed of the proceeding. Any member of the Review Group can request that the Executive Committee consider a review of the draft Regulatory Analysis. A decision to conduct a review is made within two weeks after publication of the NPRM. If two or more Executive Committee members are in favor, review will be held and notice to this effect will be submitted to the agency's public record for this regulatory proceeding.
- o Once the Executive Committee votes to review a Regulatory Analysis, CWPS prepares a draft statement of concerns which it submits to the Review Group for approval. After taking into account any agency suggestions, CWPS then submits the Review Group's statement of concerns to the agency's public record for this proceeding.
- o About two weeks before the rulemaking record closes, CWPS delivers a draft report that focuses on these concerns to the Review Group, which meets to discuss the report and any needed changes. CWPS has a week to revise this draft, incorporating written and oral comments submitted by Review Group members.
- o Generally a second Review Group meeting then is held to go over the revised draft. The Review Group decides whether to accept the revised draft. Any dissenting views of the members are either incorporated in the report or attached separately.
- o CWPS submits the final Review Group report into the rulemaking record on the last day of the public comment period.

Department of Agriculture

Howard Hjort  
Director of Economic Policy  
Analysis and Budget  
Department of Agriculture  
Room 102A, Administration Building  
Washington, DC 20250 STOP 445  
Tel.: 447-5681

Department of Commerce

Courtenay Slater, Chief Economist  
Department of Commerce  
14th & Constitution Avenue, N.W.  
Room 4848  
Washington, DC 20230 STOP 206  
Tel.: 377-3523

David Lund, Economist  
Department of Commerce  
14th & Constitution Avenue, N.W.  
Room 4836  
Washington, DC 20230 STOP 206  
Tel.: 377-3080

Council of Economic Advisers

George Eads  
Council of Economic Advisers  
Room 314, OEOB  
Washington, DC 20506  
Tel.: 395-5046

Elizabeth Kaminski  
Council of Economic Advisers  
Room 317, OEOB  
Washington, DC 20506  
Tel.: 395-5108

Council of Environmental Quality

James G. Speth, Chairman  
Council on Environmental Quality  
722 Jackson Place  
Room 25  
Washington, DC 20006  
Tel.: 395-5700

Edward Strohbehn, Jr.  
Executive Director  
Council on Environmental Quality  
722 Jackson Place  
Room 31  
Washington, DC 20006  
Tel.: 395-5754

Paul Portney  
Council on Environmental Quality  
Room 5025, NEOB  
Washington, DC 20506  
Tel.: 395-4904

Council on Wage and Price Stability

R. Robert Russell  
Director  
Council on Wage and Price Stability  
600 17th Street, N.W.  
Washington, DC 20506  
Tel.: 456-6466

Thomas D. Hopkins  
Assistant Director for  
Government Programs and Regulations  
Council on Wage and Price Stability  
600 17th Street, N.W.  
Washington, DC 20506  
Tel.: 456-7995

Domestic Policy Staff

Simon Lazarus  
Associate Director  
Domestic Policy Staff  
Room 227  
OEOB  
Washington, DC 20500  
Tel.: 456-2273

Rick Neustadt  
Domestic Policy Staff  
Room 208  
OEOB  
Washington, DC 20500  
Tel.: 456-2648

Department of Energy

Stuart W. Ray  
Director, Office of Planning and  
Regulatory Program Evaluation  
Department of Energy  
1000 Independence Avenue, S.W.  
Room 7A-097, Forrestal Building  
Washington, DC 20585  
Tel.: 252-5421

Ronald Lewis  
Deputy Advisor to the President  
for Regulatory Policies  
White House/Council on Wage and  
Price Stability  
Room 352-Old Executive Off. Bldg  
Washington, D. C. 20506  
Tel.: 456-2934

Dennis A. Rapp  
Deputy Advisor to the President  
for Government Operations  
White House/Council on Wage and  
Price Stability  
Room 345-Old Executive Off. Bldg  
Washington, D. C. 20506  
Tel.: 456-7770

William Strauss  
Department of Energy  
1000 Independence Avenue, S.W.  
Room 7A-097, Forrestal Building  
Washington, DC 20585  
Tel.: 252-5421

Environmental Protection Agency

Bill Drayton  
Assistant Administrator for  
Planning and Management  
Environmental Protection Agency  
401 M Street, S.W.  
Room 1013, West Tower  
Washington, DC 20460 STOP 460  
Tel.: 755-2900

Roy Gamse  
Deputy Assistant Administrator  
for Planning and Evaluation  
Environmental Protection Agency  
401 M Street, S.W.  
Room 1013, West Tower  
Washington, DC 20460 STOP 460  
Tel.: 755-2920

Department of Health, Education, and Welfare

Ben W. Heineman, Jr.  
Assistant Secretary for  
Planning and Evaluation  
Department of Health, Education,  
and Welfare  
200 Independence Avenue, S.W.  
Room 415F  
Hubert Humphrey Building  
Washington, DC 20201 STOP 367  
Tel.: 245-1858

Walton Francis  
Director of Policy Analysis  
and Research  
Department of Health, Education,  
and Welfare  
200 Independence Avenue, S.W.  
Room 455D, Main HEW  
Washington, DC 20201 STOP 367  
Tel.: 245-0291

Department of Housing and Urban Development

Donna E. Shalala  
Assistant Secretary for Policy  
Development and Research  
Department of Housing and Urban  
Development  
451 Seventh Street, S.W.  
Room 8100  
Washington, DC 20410 STOP 98  
Tel.: 755-5600

Dick Clemmer  
Branch Chief  
Department of Housing and  
Urban Development  
451 Seventh Street, S.W.  
Room 8210  
Washington, DC 20410 STOP 98  
Tel.: 755-6164

Department of Interior

Heather Ross  
Deputy Assistant Secretary for Policy,  
Budget, and Administration  
Department of Interior  
18th & C Streets, N.W.  
Room 5100, Main Interior  
Washington, DC 20240 STOP 43  
Tel.: 343-4123

Department of Justice

John Shenefield  
Assistant Attorney General  
Antitrust Division  
Department of Justice  
10th & Constitution Avenue, N.W.  
Room 3109  
Washington, DC 20530 STOP 219  
Tel.: 633-2107

Donald Flexner  
Deputy Assistant Attorney General  
Antitrust Division  
Department of Justice  
10th & Constitution Avenue, N.W.  
Room 3115  
Washington, DC 20530 STOP 219  
Tel.: 633-2411

Department of Labor

Nancy Barrett  
Deputy Assistant Secretary for  
Economic Policy and Research  
Department of Labor  
200 Constitution Avenue, N.W.  
Room S2233, Main Labor  
Washington, DC 20210 STOP 205  
Tel.: 523-6212

Roland Droitsch  
Director  
Office of Macroeconomics and Economic  
Policy Review  
Department of Labor  
200 Constitution Avenue, N.W.  
Room S2312, Main Labor  
Washington, DC 20210 STOP 205  
Tel.: 523-6197

Office of Management and Budget

Wayne Granquist  
Associate Director for Management  
and Regulatory Policy  
Office of Management and Budget  
Room 244, OEOB  
Washington, DC 20503  
Tel.: 395-3423

Jim Tozzi  
Office of Management and Budget  
Room 8222, NEOB  
Washington, DC 20503  
Tel.: 395-6827

Van Doorn Ooms  
Office of Management and Budget  
Room 256, OEOB  
Washington, DC 20503  
Tel.: 395-5873

Stanley Morris  
Office of Management and Budget  
Room 10202, NEOB  
Washington, DC 20503  
Tel.: 395-6176

Office of Science and Technology Policy

Gilbert S. Omenn  
Office of Science and Technology Policy  
Room 358, OEOB  
Washington, DC 20506  
Tel.: 456-7116

Department of Transportation

Mortimer L. Downey III  
Assistant Secretary for Budget  
and Programs  
Department of Transportation  
400 7th Street, S.W.  
Room 10103  
Washington, DC 20590 STOP 330  
Tel.: 426-9191

Robert Presteman  
Director of Programs and Evaluations  
Department of Transportation  
400 7th Street, S.W.  
Room 10124  
Washington, DC 20590 STOP 330  
Tel.: 426-4450

Department of the Treasury

Beatrice Vacarra  
Acting Assistant Secretary for  
Economic Policy  
Department of Treasury  
Room 3452  
Washington, DC 20220 STOP 223  
Tel.: 566-2551

Maynard Comiez  
Director for Special Studies  
Department of Treasury  
Room 4460  
Washington, DC 20220 STOP 223  
Tel.: 566-5808

Executive Committee Members

Council of Economic Advisors  
Office of Management and Budget  
Environmental Protection Agency  
Department of Labor