

Written Testimony of

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before the

The Subcommittee on Regulatory Reform, Commercial and Antitrust Law
U.S. House of Representatives

on

"The Regulatory Flexibility Improvements Act of 2013"

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Mr. Chairman and Members of the Committee,

Thank you for the opportunity to testify today on the Regulatory Flexibility Improvements Act of 2013. I am Amit Narang, Regulatory Policy Advocate at Public Citizen's Congress Watch. Public Citizen is a national public interest organization with more than 300,000 members and supporters. For more than 40 years, we have successfully advocated for stronger health, safety, consumer protection and other rules, as well as for a robust regulatory system that curtails corporate wrongdoing and advances the public interest.

Public Citizen co-chairs the Coalition for Sensible Safeguards (CSS). CSS is an alliance of more than 75 consumer, small business, labor, scientific, research, good government, faith, community, health and environmental organizations joined in the belief that our country's system of regulatory safeguards provides a stable framework that secures our quality of life and paves the way for a sound economy that benefits us all. Time constraints prevented the Coalition from reviewing my testimony in advance, and today I speak only on behalf of Public Citizen.

The Regulatory Flexibility Improvements Act (RFIA) seeks to help a segment of our economy that all would agree is essential to keeping our economy thriving. Unfortunately, this legislation will do little to help genuine small businesses, and will come at an enormous cost in terms of undermining our federal agencies' ability to provide crucial public health and safety protections, civil rights, workers' rights, consumer safety standards, and environmental standards.

As discussed more fully below, the RFIA takes a "sledgehammer" to the regulatory process where only a "scalpel" at most is needed. The legislation makes drastic and unnecessary reforms to the Regulatory Flexibility Act (RFA) which, in turn, will place great pressure on federal agencies to consider almost all of their rules as significantly impacting small business, even in cases where the rule is only setting public health and safety standards for large companies. As a result, agencies will be bogged down in senseless busywork in a search for impacts on small businesses that simply do not exist. Since the RFIA does not provide any funding for the significant added mandates it imposes on federal agencies, the end result will be, at a minimum, further delayed public protections, with many crucial new safeguards never seeing the light of day. Congress should instead explore ways to provide direct assistance to real small businesses while preserving our country's system of existing safeguards and our government's ability to respond to emerging threats. A promising consensus path forward is highlighted at the end of this testimony.

I. Regulations Do Not Kill Jobs, They Save Lives

First, there is little empirical evidence supporting the claim that there is a trade-off between economic growth and strong, effective regulatory standards. Experts from across the political spectrum have acknowledged that arguments linking regulations to job losses are nothing more than mere fiction. For example, Bruce Bartlett, a prominent conservative economist who worked in

both the Reagan and George H.W. Bush administrations, referred to the argument that cutting regulations will lead to significant economic growth as “just nonsense” and “made up.”¹

Mr. Bartlett’s claims are backed up by a recent World Bank study that surveyed economic conditions across the world and ranked countries according to the “ease of doing business” in those countries. The study ranked the U.S. number four overall and number one among the 25 largest economies.² In the words of the World Bank, “A high ranking on the ease of doing business index means the regulatory environment is more conducive to the starting and operation of a local firm.” The World Bank recognized that the regulatory environment includes many rules that enhance and protect business activity, and the U.S. ranks especially high in protecting investors, enforcing contracts, and getting credit.

In fact, the available evidence shows that there is simply no clear link between regulations and job losses. Rather, recent data from the Bureau of Labor Statistics demonstrate that insufficient demand for products and services is what’s driving layoffs and job losses. As the figure below depicts, employers cite business demand roughly 100 times more often government regulations as the reason for mass layoffs:

Reason for layoff: 2008-2011³

	2008	2009	2010	2011
Business Demand	516,919	824,834	384,564	366,629
Governmental regulations/intervention	5,505	4,854	2,971	2,736

To the extent that there is a link between regulations and job losses, it points in the opposite direction with a lack of regulation being the culprit for the financial collapse of 2008 and the ensuing Great Recession. As the Financial Crisis Inquiry Commission noted, “Widespread failures in financial regulation and supervision proved devastating to the stability of the nation’s financial markets.”⁴ A recent GAO report quantified the tragic costs of the financial crisis, finding that lost economic output could exceed \$13 trillion and that American households collectively lost \$9.1

¹ Charles Babington, Bruce Bartlett, Ex-Reagan Economist: Idea That Deregulation Leads to Jobs ‘Just Made Up,’ Huffington Post, October 30, 2011, http://www.huffingtonpost.com/2011/10/31/gop-candidates-plans-on-economy-housing_n_1066949.html?view=print&comm_ref=false.

² World Bank, Doing Business: Measuring Business Regulations available at: <http://www.doingbusiness.org/rankings>

³ U.S. Department of Labor, Bureau of Labor Statistics. (2012, November). *Extended Mass Layoffs in 2011. Table 5. Reason for layoff: extended mass layoff events, separations, and initial claimants for unemployment insurance, private nonfarm sector, 2009-2011.* Available from: <http://www.bls.gov/mls/mlsreport1039.pdf>; U.S. Department of Labor, Bureau of Labor Statistics. (2011, November). *Extended Mass Layoffs in 2010. Table 6. Reason for layoff: extended mass layoff events, separations, and initial claimants for unemployment insurance, private nonfarm sector, 2008-2010.* Available from: <http://www.bls.gov/mls/mlsreport1038.pdf>.

⁴ Financial Crisis Inquiry Commission. (2011). *The Financial Crisis Inquiry Report: Final Report of the National Commission on the Causes of the Financial and Economic Crisis in the United States.* Washington, D.C.: Government Printing Office. p. 30.

trillion.⁵ The lack of demand that has been driving the mass layoffs can be directly attributed to the economic slowdown following this financial crisis. It's no surprise then to see a prominent small business poll from earlier this year show overwhelming support for holding Wall Street accountable.⁶ The RFIA, if enacted, would work to further stall, and potentially block, key parts of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank) and thus lay the foundation for future economic and job losses.

Second, the benefits that federal regulations provide to our country consistently dwarf the costs of those regulations according to official government figures. Every year, the Office of Management and Budget (OMB) analyzes the costs and benefits of rules with a major economic impact in a report to Congress. The most recent OMB report found that:

The estimated annual benefits of major Federal regulations reviewed by OMB from October 1, 2002, to September 30, 2012, for which agencies estimated and monetized both benefits and costs, are in the aggregate between \$193 billion and \$800 billion, while the estimated annual costs are in the aggregate between \$57 billion and \$84 billion. These ranges are reported in 2001 dollars and reflect uncertainty in the benefits and costs of each rule at the time that it was evaluated.⁷

This means that even by the most conservative OMB estimates, the benefits of major federal regulations over the last decade have exceeded their costs by a factor of more than two-to-one, and benefits may have exceeded costs by a factor of up to 14.

Yet, the raw numbers do not fully portray the critical role that regulations play in our lives every day. Regulations have made our food supply safer; saved hundreds of thousands of lives by making our air and water supply safer; saved countless lives by taking unsafe products off the shelves and ensuring that product manufacturers adhere to strict safety standards; protected consumers from unfair and deceptive financial products; empowered disabled persons by allowing them means to access public facilities; made our workplaces safer environments for workers; and much more.

While many of us take these regulatory protections as granted, the true value of regulatory standards become tragically apparent following avoidable crises and catastrophes stemming from a lack of regulation. Deregulatory failures such as the aforementioned 2008 financial collapse and Great Recession, the 2010 British Petroleum oil spill disaster in the Gulf of Mexico, the Upper Big Branch mine explosion in West Virginia, the numerous tainted food recalls and food safety crises that still occur on a regular basis, the massive recalls of unsafe children's toys and defective

⁵ U.S. Government Accountability Office. (2013, Jan. 13). Financial Crisis Losses and Potential Impacts of the Dodd-Frank Act. p. 12. available at: <<http://www.gao.gov/products/GAO-13-180>>.

⁶ Small Business Majority, Opinion Poll: Small Businesses Support Strong Accountability for Financial Industry, (Jan. 29, 2013), <http://www.smallbusinessmajority.org/small-business-research/financial-reform/small-business-opinion-on-financial-reform.php>.

⁷ Office of Management and Budget, Office of Information and Regulatory Affairs. (2013). Draft 2013 Report to Congress on the Benefits and Costs of Federal Regulations and Unfunded Mandates on State, Local, and Tribal Entities. p.3. available at: http://www.whitehouse.gov/sites/default/files/omb/inforeg/2013_cb/draft_2013_cost_benefit_report.pdf

consumer products, and most recently the explosion at a West Texas fertilizer plant, all point to the need to strengthen, not weaken, our system of regulatory protections.

No wonder, then, that opponents of strong regulatory protections seek to obscure the clear and tangible benefits of regulation by focusing myopically on the costs of regulation, even to the point of exaggerating such cost estimates to an implausible degree. The most famous, or notorious, of these inflated regulatory cost estimates is the so-called “Crain and Crain” study,⁸ commissioned by the Small Business Administration’s (SBA) Office of Advocacy, which found the annual costs of significant regulations amount to 1.75 trillion dollars a year. Touted by many, this deeply flawed study has been universally discredited by experts and peer reviewers from across the political spectrum. Former OIRA administrator Cass Sunstein has previously stated that the study “should be considered nothing more than an urban legend”⁹ while former OIRA Administrator under President George W. Bush, John Graham, has stated that a prior iteration of the study “might not pass OMB information quality guidelines.”¹⁰ The CRS report analyzing the study contained a striking admission by the study’s authors that they did not intend for the study to be used for policy making purposes because it only included discussion of potential costs of regulation with no discussion of potential benefit.¹¹ None of this has stopped lawmakers from repeatedly citing the study as justification for their claims of “overregulation” and the public is regularly misled by new reports that inflate estimates of the costs of regulation with nary a mention of the benefits they bring.

Finally, it is true that the regulatory system is broken, but not because there is too much regulation. Rather the system is broken because the current regulatory process is too slow, too calcified, and too inflexible to respond to public health and safety threats as they emerge. As Public Citizen’s striking visual depiction of the regulatory process shows,¹² the current process is a model of inefficiency, with a dizzying array of duplicative and redundant requirements interspersed throughout a byzantine network that is a virtual maze for agencies to navigate. This is the result of an accumulation of analyses and procedures that Congress and the Executive have imposed on agencies over the years leaving agencies in a state of “paralysis by analysis.” Far from the popular conception of “regulators run amok,” the reality is that agency delays are rampant, deadlines are routinely missed or pushed back, and ample evidence exists that the situation is getting worse.

Last July, Public Citizen conducted an analysis of public health and safety rulemakings that Congress required agencies to implement with strict deadlines.¹³ Our analysis showed that most

⁸ Nicole V. Crain and W. Mark Crain, *The Impact of Regulatory Costs on Small Firms* (2010) available at <http://www.sba.gov/advocacy/7540/49291>

⁹ Mark Drajem, *Rules Study Backed by Republicans ‘Deeply Flawed,’ Sunstein Says* (Bloomberg, June 3, 2011) available at <http://www.bloomberg.com/news/2011-06-03/rules-study-backed-by-republicans-deeply-flawed-sunstein-says.html>

¹⁰ Hearing on H.R. 2432, *Paperwork and Regulatory Improvements Act of 2003* Before the H. Comm. On Gov’t Reform, 108th Cong. Tr. 21 (2003) (statement of John Graham).

¹¹ Curtis W. Copeland, *Analysis of an Estimate of the Total Cost of Federal Regulations 2* (Cong. Research Serv., R41763, Apr. 6 2011).

¹²Public Citizen, *The Federal Rulemaking Process*, <http://www.citizen.org/documents/Regulations-Flowchart.pdf>.

¹³ Negah Mouzoon, *Public Safeguards Past Due: Missed Deadlines Leave Public Unprotected*, Public Citizen, June 2012, <http://www.citizen.org/documents/public-safeguards-past-due-report.pdf>.

rules are issued long after their deadlines have passed, putting American consumers at risk. Of the 159 rules analyzed, 78 percent missed their deadline and more than half remained incomplete at the time. Federal agencies miss these deadlines for a variety of reasons, including having to conduct onerous analyses, inadequate resources or agency commitment, and fear of judicial review. A report just released by CSS also confirms these delays continue unabated.¹⁴ The CSS report profiled eight rules critical to public health and safety that have been stuck at various stages of the rulemaking process for years. Many of these rules are required by Congress, with clear deadlines that agencies have been unable to meet because the regulatory process is so slow.

None of this should come as a surprise to this committee. In late 2011, an expert testified before this committee that it takes agencies on average four to eight years to finalize and enforce significant regulations.¹⁵ This comports with a recent Government Accountability Office (GAO) report finding that it takes the Occupational Safety and Health Administration (OSHA) on average seven years to develop and finalize health and safety standards.¹⁶ Clearly, no one can point to the federal agency rulemaking process as a paragon of government efficiency.

Perhaps the most vivid example of excessive and unreasonable regulatory delays is the ongoing process of putting basic financial reforms in place after the financial crisis of 2008 by implementing the Dodd-Frank Wall Street Reform and Consumer Protection Act. According to the most recent report by the law firm DavisPolk, a total of 279 Dodd-Frank rulemaking requirement deadlines have passed.¹⁷ Of these 279 passed deadlines, only 104, or approximately 37% have been met with finalized rules.¹⁸ Overall, only 153 of the 398 total required rulemakings have been finalized, while 128 required rulemakings have yet to even be *proposed*.¹⁹

These delays and missed deadlines are the sign of a broken regulatory system that is crumbling under the cumulative weight of ever increasing analytical and procedural requirements. The RFIA would make the situation worse in several key respects.

II. RFIA: Small Business Bill In Name Only

The RFIA is another in a long string of so-called “regulatory reform” measures that are designed to slow down or prevent agencies from carrying out their congressionally required responsibilities to protect the health and safety of the American public. Although this legislation is supposedly intended to provide small businesses with regulatory relief, the legislation will actually give big

¹⁴ Coalition for Sensible Safeguards, *Down the Regulatory Rabbit Hole: How Corporate Influence, Judicial Review, and Lack of Transparency Delay Crucial Rules and Harm the Public* available at: <http://sensiblesafeguards.org/assets/documents/down-the-regulatory-rabbit-hole.pdf>

¹⁵ Testimony of Sidney Shapiro, Hearing on H.R. 3010, The Regulatory Accountability Act of 2011, House Judiciary Committee, 112th Congress (Oct 25, 2011) available at <http://judiciary.house.gov/hearings/pdf/Shapiro%2010252011.pdf>

¹⁶ *Workplace Safety and Health: Multiple Challenges Lengthen OSHA's Standard Setting: Hearing Before the S. Comm. on Health, Education, Labor, and Pensions*, 113th Cong. (2012) (statement of Revae Moran, Director, Education, Workforce, and Income Security).

¹⁷ DavisPolk. (2013, June) Dodd-Frank Progress Report. Available at: <<http://www.davispolk.com/Dodd-Frank-Rulemaking-Progress-Report>>.

¹⁸ *Id.*

¹⁹ *Id.*

business interests an even more effective tool to avoid common-sense regulatory standards and safeguards.

A. RFIA renders “small business impacts” meaningless

The RFIA stipulates that rules which have an “indirect economic effect on small entities which is reasonably foreseeable” be required to go through the same analysis regarding small business impacts as those rules which have a direct impact on small businesses. In other words, the RFIA would force agencies to assess not just the particular impacts of a proposed on regulated small businesses but also the indirect and ancillary impacts on any small entities not covered, or intended to be covered, by the regulation. The RFIA does little to clarify what constitutes, and more importantly, what does *not* constitute an indirect economic effect, giving agencies only the vague and perfunctory guidance that it be “reasonably foreseeable.” This ill-defined and indeterminate new mandate will exert strong pressure on agencies to engage in a guessing game of sorts as they attempt to identify all possible indirect effects of a rule, an enterprise akin to ordering a meteorologist to discern the effects on Washington, D.C. weather of a butterfly flapping its wings in Japan.

Making matters worse, the RFIA ensures that if agencies guess wrong on indirect effects, regulated entities will have the ability to drag the agency into court and overturn a rule because the agency wasn’t able to satisfy this new and highly speculative mandate of determining all indirect effects. Thus, the RFIA opens the floodgates of litigation and transforms a statute that is supposed to target rules that apply to small businesses into one that forces agencies, by default, to assume that their rules will in some indirect and attenuated fashion apply to small businesses.

B. The RFIA creates a new regulatory “czar” in the SBA Office of Advocacy

The RFIA gives a small office within the SBA, the Office of Advocacy (SBA Advocacy), unprecedented powers to intervene in agency rulemakings and shape and influence the substance of rules before allowing the broader public to see and comment on the rules once they are published in the *Federal Register*. This is troubling given that recent reports have revealed Advocacy to be operating very differently in practice than its innocuous sounding mission to “advance the views and concerns of small businesses.”²⁰

Early this year, The Center for Effective Government (CEG) released a report suggesting that the SBA Office of Advocacy played an improper role by intervening and commenting on agency scientific risk assessments on the cancer risk of certain chemicals at the behest of trade industry lobbyists for large chemical companies, not small businesses.²¹ Through Freedom of Information Act requests that disclosed e-mail correspondence, CEG found that lobbyists for the American Chemistry Council (ACC) contacted SBA Advocacy in November 2011 and requested that SBA Advocacy intervene on ACC’s behalf to rebut the scientific evidence prepared by Department of

²⁰ Small Business Association, <http://www.sba.gov/advocacy/809/480811> (last visited June 26, 2013).

²¹ See Randy Rabinowitz, Katie Greenhaw, & Katie Weatherford, *Small Businesses, Public Health, and Scientific Integrity: Whose Interests Does the Office of Advocacy at the Small Business Administration Serve?*, Center for Effective Government, January 2013.

Health and Human Services (HHS) showing formaldehyde to be a “known carcinogen.”²² SBA Advocacy complied with the request and asked lobbyists for the ACC to provide a “detailed industry” rebuttal to the HHS scientific finding.²³ Further, Advocacy made no effort on its end to verify the industry science that it was being asked to support.²⁴ Importantly, the CEG report shows that no small businesses requested that Advocacy intervene in this fashion on behalf of large chemical companies, nor did any small businesses file comments criticizing the scientific findings on formaldehyde by HHS.²⁵

The CEG report also found that Advocacy again played a similar improper role regarding scientific risk assessments for a chemical called Hexavalent Chromium, listed as a “known human carcinogen” since 1980.²⁶ In response to EPA’s interest in establishing new drinking water standards for chromium levels nationwide, the American Chemistry Council’s Hexavalent Chromium Panel mobilized to push back and enlisted SBA Advocacy as a key ally.²⁷ In June 2011, ACC lobbyists asked SBA Advocacy to send a letter to EPA requesting that an industry scientific assessment of chromium, conducted by the ACC, be completed before EPA proceed on chromium standards.²⁸ Again, SBA Advocacy performed no independent verification of the scientific claims being made by the ACC, and were not contacted by any small businesses to engage in this matter.²⁹ Not surprisingly, when SBA Advocacy agreed to the request and sent a letter to EPA, the letter was remarkably similar to the ACC’s comments to EPA and parroted exact language forwarded to SBA Advocacy by the ACC.³⁰

These disturbing revelations give the strong impression that the SBA Office of Advocacy is a taxpayer funded voice for large business interests, rather than the small business interests that it was created to represent. When Advocacy takes positions on agency scientific findings and regulations, the public should have faith that those positions are soundly supported by SBA Advocacy’s own analysis and reflect the interests of legitimate small businesses. SBA Advocacy should not be using their authority as a front for large companies and their trade associations under the guise of helping small businesses. Rather than giving new and unprecedented powers to SBA Advocacy, Congress should seek to bring basic accountability and transparency to SBA Advocacy to ensure it is fulfilling its mission on behalf of small business.

C. SBREFA panels for all agencies irrespective of small business impacts

The RFIA would entail a dramatic expansion of the Small Business Regulatory Flexibility Act (SBREFA) review panel process. Under current law, three agencies, the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), and the Consumer Financial Protection Bureau (CFPB), are required to convene SBREFA review panels for every

²² *Id.* at 18.

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.* at 17.

²⁶ *Id.* at 23.

²⁷ *Id.* at 25.

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Id.* at 26.

proposed rule that will have a “significant economic impact on a substantial number of small entities.”³¹ Under the RFIA, all agencies would be required to conduct SBREFA review panels if their regulation would result “in an annual effect on the economy of \$100,000,000 or more,” “major increase in costs or prices,” “significant adverse effects” on a variety of economic factors, “or a significant economic impact on a substantial number of small entities.” Note here that under the RFIA, SBREFA panels are required even when an agency has demonstrated that a regulation will result in no small business impacts whatsoever. This is a significant transformation of the SBREFA review panel process which currently is designed to provide input into rules that actually affect small businesses. As illustrated below, the new expanded scope of SBREFRA panels will result in these panels giving feedback on rules that have no application and place no requirements on small businesses. Once again, the RFIA stretches the boundaries of what is considered a regulation that impacts small businesses to such a degree that the distinction between what does and what does not impact small businesses is rendered meaningless.

Moreover, this expansion of the SBREFA review panel process will entail significant resources for both the SBA and federal agencies that is simply unaccounted for in this legislation. In 2012, federal agencies issued 83 “economically significant” rules,³² meaning those with an impact of over \$100,000,000. If the RFIA had been in effect, the SBA would have conducted 83 SBREFA review panels for the rules finalized last year alone. The enormity of this undertaking, in terms of staffing and resources, cannot be understated. Agencies frequently spend months diligently preparing for the panels. A recent GAO report detailing the glacially slow pace of rulemaking at OSHA identified the SBREFA panel process as one of the factors delaying OSHA, finding that it takes about 8 months of work for OSHA to prepare for the panel.³³ The increased workload for the SBA Office of Advocacy will also likely cause delays in their ability to conduct these review panels expeditiously and efficiently. The only way for Congress to impose this significant new mandate for an expanded SBREFA review panel process without creating lengthy delays is to provide commensurate funding. Unfortunately, the RFIA does not do this.

III. A Consensus Path Forward

As previously discussed, the RFIA’s inclusion of indirect costs, empowerment of the SBA Office of Advocacy, and wide-ranging expansion of the SBREFA review panel process all lead to one inevitable result: regulations that have no impact on small businesses are nonetheless subject to extensive analyses and procedures currently reserved only for those rules that do actually affect small businesses. Ultimately, the RFIA will work to delay or completely block rules designed to curtail big business wrongdoing and irresponsibility that result in enormous costs to our society’s health and safety, all the while invoking the goal of “small business regulatory relief.” Congress

³¹ Small Business Regulatory Enforcement Fairness Act of 1996, Pub. L. No. 104-121, 110 Stat. 857 (1996) (codified in scattered sections of 5 U.S.C., 15 U.S.C., and 28 U.S.C.).

³² Maeve P. Carey, *Counting Regulations: An Overview of Rulemaking, Types of Federal Regulations, and Pages In the Federal Register* 11 (Cong. Research Serv., R43056, May 1, 2013).

³³ *Workplace Safety and Health: Multiple Challenges Lengthen OSHA’s Standard Setting: Hearing Before the S. Comm. on Health, Education, Labor, and Pensions*, 113th Cong. (2012) (statement of Revae Moran, Director, Education, Workforce, and Income Security).

should not be passing legislation like the RFIA that lets Big Business off the hook by giving them a free pass in the name of small businesses.

Fortunately, there is a path forward that does not undercut our government's ability to establish clear rules of the road and strong regulatory standards while providing small businesses with targeted regulatory relief: small business regulatory compliance assistance. Right now, federal agencies are not required to provide meaningful compliance assistance to small businesses. Instead, they are only required to answer inquiries and provide compliance guides. It is clear that agencies can do more to help small businesses understand and meet their regulatory obligations.

Congress should consider legislation to amend the Small Business Regulatory Enforcement Fairness Act by requiring agencies to conduct more outreach, education and compliance assistance to small businesses on their regulatory obligations. Many agencies already have existing Small Business Ombudsman offices that were specifically created to help small businesses with compliance issues once regulations are issued.³⁴ Legislation is needed to ensure that those offices are conducting effective regulatory outreach and education to small businesses by, for example, establishing "best practices" guidelines for federal agencies, particularly those with Small Business Ombudsman offices, to follow when working to ease regulatory compliance for small businesses. The virtues of compliance assistance are clear: real small businesses receive direct and tangible assistance in complying with regulations and the enormous benefits that public health and safety regulations provide to our country are preserved.

There are clearly better ways to help small business without sacrificing vital public health and safety protections. Supporters of this legislation are mistaken if they believe the RFIA will improve or streamline the rulemaking process. Far from it, the RFIA will cater to large corporate special interests by depriving the American people of critical safeguards to ensure clean air and water, safe food, consumer products and workplaces, and a stable, prosperous economy, all under the guise of helping small business.

³⁴ A list of small business ombudsman offices can be found at <http://www.sba.gov/category/navigation-structure/starting-managing-business/starting-business/business-law-regulations/contact-government-agency/fe>