

# Former Administrators of the Office of Information and Regulatory Affairs

September 23, 2022

The Honorable Gary C. Peters, Chairman  
Senate Committee on Homeland Security and Governmental Affairs  
340 Senate Dirksen Office Building  
Washington, DC 20510

The Honorable Rob Portman, Ranking Member  
Senate Committee on Homeland Security and Governmental Affairs  
340 Senate Dirksen Office Building  
Washington, DC 20510

Dear Mr. Chairman and Mr. Ranking Member:

The Office of Information and Regulatory Affairs (OIRA) has helped presidents, both Democratic and Republican, ensure that federal regulations are designed to provide the greatest value to the American people. Objective evaluation of regulatory benefits and costs and open, transparent, and responsive regulatory procedures are essential to the development of effective public policy free from the undue influence of narrow interests. The undersigned are former OIRA Administrators who for almost three decades have worked to achieve these essential goals under administrations of both parties. We believe it is vital that OIRA have strong leadership in place as the administration and Congress confront a range of difficult and complex regulatory challenges.

President Biden has nominated Richard Revesz, the AnBryce Professor of Law and Dean Emeritus of the New York University School of Law, to serve as OIRA Administrator. Among Professor Revesz's professional accomplishments, he has served as the Executive Director of the American Law Institute, the founder and Director of the Institute of Policy Integrity, a Public Member and Senior Fellow of the Administrative Conference of the United States, and a member of the Science Advisory Board of the Environmental Protection Agency.

Some of us have disagreed, and continue to disagree, with Professor Revesz on important questions of regulatory policy, as we have disagreed with each other. We are united, however, in our belief that Professor Revesz, if confirmed, would devote his considerable intellectual acumen and skills toward the promotion of OIRA's core missions. We therefore respectfully request that

the Senate Committee on Homeland Security and Government Affairs move as quickly as possible on this important nomination. Given the essential role that OIRA has to play in policy initiatives already under way, we urge the Committee to proceed expeditiously with hearings and a recommendation so that the full Senate can vote on Professor Revesz's nomination.

Sincerely,



Sally Katzen  
(June 1993 – February 1997)



Susan E. Dudley  
(April 2007 – January 2009)



John T. Spotila  
(July 1999 – December 2000)



Howard Shelanski  
(June 2013– January 2017)



John D. Graham  
(July 2001 – March 2006)



Paul J. Ray  
(January 2020 – January 2021)

*Please note: Two former administrators who have served since 1993 are not signatories. Cass R. Sunstein (September 2009 – August 2012) is now serving in this Administration, and Neomi Rao (July 2017 – March 2019) is now a United States Circuit Judge. Canon 7 of the Code of Conduct for United States Judges provides that a "judge may not endorse ... a candidate for public office."*