

Comment from Jonathan Dols, Government Member  
April 9, 2021

DOT has a couple of comments on the draft recommendations:

Line 132: Whether a rule maximizes net benefits is not a precise question (maximum relative to....?). Suggest deleting.

Line 137-138: Recommend deleting “randomized control trials or quasi-experimental methods” as examples because these methods are probably the least likely to be used in a retrospective review. For example, a regulation typically applies to units (e.g. the entire U.S.) for which randomization and assigning control groups is not possible. Perhaps combine with previous recommendation on information, as the information collected will determine the method used.