



Institute *for*
Policy Integrity

new york university school of law

May 8, 2012

Committee on Collaborative Governance
Administrative Conference of the United States
Comments@acus.gov

Subject: Committee on Collaborative Governance—Comments on Proposed Recommendations for Improving Agency Coordination in Shared Regulatory Space (posted April 10, 2012)

The Institute for Policy Integrity at NYU School of Law submits the following comments on the ACUS Committee on Collaborative Governance's proposed recommendations for improving agency coordination. Policy Integrity is a non-partisan think tank dedicated to improving the quality of government decisionmaking through advocacy and scholarship in the fields of administrative law, cost-benefit analysis, and public policy.

Though the Committee's draft recommendations focus largely on joint rulemakings, memoranda of understanding, and interagency consultation practices, the aim of the ACUS project is broader: "to identify . . . best practices for collaboration and coordination among regulatory agencies."¹ As such, the attached draft letter that Policy Integrity will submit to OIRA on promoting interagency coordination should be relevant to the Committee's work. In particular, our comments on addressing claims of regulatory conflict and incoherence should inform ACUS's recommendations on identifying areas of overlapping jurisdiction, and our comments on standardizing methodological practices should inform ACUS's recommendations on agency coordination on cost-benefit analysis.

Sincerely,

Michael A. Livermore
Jennifer Rosenberg
Jason A Schwartz

Institute for Policy Integrity
New York University School of Law

Attached: Policy Integrity Draft Letter to OIRA on Interagency Coordination

¹ ACUS, *Improving Agency Coordination in Shared Regulatory Space*, <http://www.acus.gov/research/the-conference-current-projects/joint-rulemaking/> (last visited May 7, 2012).