

Comment from Cynthia Farina, Senior Fellow

13. Add “sometimes” at end of line after “can”. To be consistent with position that enhanced engagement is appropriate for selected RMs, not all RMS.

21. Add “or in conjunction with” after “before.” Some of the recommendations apply as well to the NPRM stage.

25. Change “more” to “a greater number of”. Clarifies that we done mean interests affected to a greater degree.

27 & 139 (and maybe others I missed). Strike “nongovernmental.” There may well be local, regional, tribal or state agencies that have useful input.

Add “or entities” after individuals to include both such agencies and NGOs.

30. Change “that will” to “to”. The techniques are intended to do this, but success can not be guaranteed.

80 & 83. Insert “types of” before individuals. Especially in the general engagement plan, agencies will not know the specific individuals or entities they will target in each RM.

99. Insert “experience and” before “expertise.” To include laypeople’s germane knowledge

107. Insert after “information”: “including the challenge of providing rulemaking materials in language and form comprehensible to nonexperts whose participation is being sought”

120 & 121. Strike the opening clause. Is there any situation in which FR publication isn’t desirable?

129 & 172. Substitute “take an open minded stance” for “remain neutral” . Agencies don’t have to be neutral about what they think the best approach is likely to be. They have to be open to changing their preliminary view.

152. After “targeted outreach” insert “because they do not normally participate” to underscore the justification for targeted outreach in the first place.

154. Add “facilitated” before “meetings” and strike “with the public.” As i makes clear, the agency may choose that the meeting will not be open to the public at large.

168. After “alternatives” add “in language and form comprehensible to all types of participants the agency seeks to engage”

169. Strike “conduct and”. Not clear what this adds or even means.

172. End this recommendation after the word “meetings” and move the remaining lines up to be incorporated in 8(b)(vi), where it fits better.

177. Replace “their webpages accessible” with “rulemaking information comprehensible”. The term website or webpage accessibility has a particular ADA-compliant meaning that is not intended here.