

**Comment from Member of the Public (identified as “L. Thomas”) on ACUS Draft Recommendation on Retrospective Review of Agency Rules**

Over time, the Retrospective Review of Agency Rules has focused more on the reduction of Paperwork Reduction Act (PRA) burden associated with rules and less on the improvement of rules, regardless of the impact to PRA burden. Whenever an agency has the opportunity to reduce burden on the public stemming from rulemaking it should do so, however, that should not be the focus of the Retrospective Review. The retrospective review should encourage agencies to re-organize rules using plain language and simple structures. Supporting, interpretive guidance, should be referenced directly in the rulemaking where possible, with web links for ease of reference. PRA sections of rulemaking (usually grouped under the titles “OMB Control Numbers” or “Reporting & Recordkeeping Requirements”) should be updated and simplified.