Center for Economic Justice – May 1, 2021

I also wanted to offer a comment on the proposed revisions to the RIRS Coding Structure. The data include a section for Origin for Action with the instruction that up to 4 sources of information or activity that resulted in the regulatory action. I suggest that instead of a Y/N data entry, the permissible data entries be 1, 2, 3 or 4 to indicate the relative importance of the source of information in prompting the regulatory action. This would enable better analysis of the most important sources of information for different types of regulatory actions. With this type of entry, the limit to sources can be increased from 4. And this would then represent a data set amendable to an AI-type analysis. I'd suggest the same numeric ordering entry approach for reason for action.

I'm unclear about the entry instructions for the Disposition for Action. The instruction state that up to 4 entries are permitted. my first question is whether multiple entries are possible or whether each action is mutually exclusive of all others. If the answer is that for the same regulatory action multiple actions are possible, then, again, I'd suggest a numerical entry approach, but starting with 1 as the first action, 2 as the second action and so on. Instead of the numerical hierarchy representing the hierarchy of importance as with Origin of Action and Reason for Action, the numerical hierarchy here would be oldest to newest.