



March 30, 2020

Administrator Andrew R. Wheeler
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Attn: Docket ID No. EPA-HQ-OA-2018-0259

Re: Request Extension on Comment Period for EPA's Strengthening Transparency in Regulatory Science, Supplemental Notice of Proposed Rulemaking, 85 FED. REG. 15,396 (MARCH 18, 2020)

Dear Administrator Wheeler:

The Association of Public and Land-grant Universities (APLU), Association of American Universities (AAU), the Association of American Medical Colleges (AAMC), and the Council on Governmental Relations (COGR) **request that the Environmental Protection Agency (EPA) extend the comment period for Docket ID No. EPA-HQ-OA-2018-0259, Strengthening Transparency in Regulatory Science, published in the Federal Register on March 18, 2020, to 90 days.** Such a complex and consequential proposed rule will require significantly more time for our associations and the institutions we represent than the current 30-day comment period will allow, especially as we respond to the coronavirus (COVID-19) pandemic.

Experts at our nation's academic institutions and teaching hospitals are on the frontlines helping protect their communities and the nation as we manage the effects of the COVID-19 pandemic. Universities are managing extraordinary challenges to their normal business operations, including making critical decisions to maintain public health and the economic stability of their university and the communities in which they reside. Extending the comment period is necessary to provide adequate time to evaluate the proposed rule in given the extraordinary circumstances of the COVID-19 pandemic.

In July 2018, our associations sent a comprehensive comment letter in response to the previous version of this proposed rule. In the letter we stated, that the "best available evidence" should be considered when developing regulations specifically aimed at protecting human health. The current COVID-19 pandemic is showing us in real time the necessity of scientific expertise in decision-making.

We respectfully urge you to extend the comment period by at least 60 days. This extension will allow us to more thoroughly assess the proposed rule while also fulfilling our mission to teach the next generation of world leaders, excel at innovative research, and serve our communities and the public during these extraordinary times.

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Sincerely,



Peter McPherson
President
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Mary Sue Coleman
President
Association of American Universities



David Skorton
President and CEO
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Wendy Streitz
President
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The AAMC is a not-for-profit association dedicated to transforming health care through innovative medical education, cutting-edge patient care, and groundbreaking medical research. Its members comprise all 155 accredited U.S. and 17 accredited Canadian medical schools; nearly 400 major teaching hospitals and health systems; and more than 80 academic societies. The Association of American Universities (AAU) is an association of 63 U.S. and two Canadian leading research universities that transform lives through education, research, and innovation. AAU member universities collectively help shape policy for higher education, science, and innovation; promote best practices in undergraduate and graduate education and strengthen the contributions of leading research universities to American society. The Association of Public and Land-grant Universities (APLU) is a research, policy, and advocacy organization with a membership of over 200 public research universities, land-grant institutions, state university systems, and affiliated organizations in the U.S., Canada, and Mexico, that is dedicated to strengthening and advancing the work of public universities. The Council on Governmental Relations (COGR) is an association of over 190 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member institutions.