



12<sup>TH</sup> ANNUAL  
ADMINISTRATIVE LAW & REGULATORY PRACTICE INSTITUTE

RULEMAKING 101

THE RULEMAKING PROCESS AND JUDICIAL REVIEW OF RULES

HALF DAY PROGRAM

**MONDAY – MARCH 14, 2016**

REGULATORY REFORM

FULL DAY PROGRAM

**TUESDAY – MARCH 15, 2016**

**THE WALTER E. WASHINGTON CONVENTION CENTER, WASHINGTON, DC**

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# 12<sup>TH</sup> ANNUAL ADMINISTRATIVE LAW & REGULATORY PRACTICE INSTITUTE

MONDAY MARCH 14, 2016

BALLROOM 202AB, SECOND FLOOR, WALTER E. WASHINGTON CONVENTION CENTER

<b>12:00 PM – 1:00 PM</b>	<b>Registration</b>
<b>1:00 PM – 2:30 PM</b>	<b>The Rulemaking Process</b>
<b>2:30 PM – 2:45 PM</b>	<b>Break</b>
<b>2:45 PM – 4:15 PM</b>	<b>Judicial Review of Rules</b>

TUESDAY MARCH 15, 2016

BALLROOM 202AB, SECOND FLOOR, WALTER E. WASHINGTON CONVENTION CENTER

<b>8:00 AM – 8:40 AM</b>	<b>Registration and Continental Breakfast</b>
<b>8:40 AM – 8:45 AM</b>	<b>Welcome and Introduction of Themes</b>
<b>8:45 AM – 9:00 AM</b>	<b>Keynote Speaker</b>
<b>9:00 AM – 10:00 AM</b>	<b>Congressional Interest in Regulatory Reform</b>
<b>10:00 AM – 11:00 AM</b>	<b>The Future of Deference</b>
<b>11:00 AM – 11:10 AM</b>	<b>BREAK</b>
<b>11:10 AM – 11:40 AM</b>	<b>The Role of OIRA in the Regulatory Process: A Discussion with OIRA Administrator Howard Shelanski</b>
<b>11:40 AM – 12:40 PM</b>	<b>The Eighth Year – OIRA and the Transition</b>
<b>12:40 PM – 1:15 PM</b>	<b>LUNCH BREAK – Ballroom 201</b>
<b>1:15 PM – 1:45 PM</b>	<b>Congressional Supervision of Executive Lawmaking: Ends and Means in Administrative Law Reform – Former OIRA Administrator Christopher DeMuth</b>
<b>1:45 PM – 1:50 PM</b>	<b>BREAK</b>
<b>1:50 PM – 2:50 PM</b>	<b>Balance Through Power: Effective Congressional Oversight of the Executive Branch</b>
<b>2:50 PM – 3:00 PM</b>	<b>BREAK</b>
<b>3:00 PM – 4:00 PM</b>	<b>Enhancing Retrospective Review of Agency Rules</b>
<b>4:00 PM – 5:00 PM</b>	<b>Warning Letters and Voluntary Compliance Programs – Is <i>Sackett v. EPA</i> a Game Changer?</b>

# PROGRAM FACULTY

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**Paul Noe**

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**Neomi Rao**

Director, Center for the Study of the Administrative State, George Mason University, Arlington, VA

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Democratic Deputy Staff Director & Chief Counsel, House Committee on Oversight and Government Reform, Washington, DC

**Howard Shelanski**

Administrator, Office of Information and Regulatory Affairs, Office of Management & Budget, Washington, DC

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**Satya Thallam**

Chief Economist, Senate Homeland Security and Governmental Affairs Committee (Chairman Johnson (R-WI)), Washington, DC

**Stephanie Tsacoumis**

General Counsel, Consumer Product Safety Commission, Bethesda, MD

# RULEMAKING 101

## The Rulemaking Process and Judicial Review of Rules

### **MONDAY – MARCH 14, 2016**

12:00 PM – 1:00 PM Registration

1:00 PM – 2:30 PM **THE RULEMAKING PROCESS**

#### **“Inside Government”**

**Daniel Cohen, Assistant General Counsel for Legislation, Regulation & Energy Efficiency, U.S. Department of Energy, Office of the General Counsel, Washington, DC**

**Andrew Emery, President, The Regulatory Group Inc., Arlington, VA**

#### **“Outside Government”**

**Russell Frye, Principal, FryeLaw PLLC, Washington, DC**

This panel will provide an introductory/refresher course on the procedural steps, legal requirements, and practical constraints applicable to issuing rules. The course will be co-taught by a team of lawyers with government and private practice experience, each bringing out considerations most relevant from their particular perspectives.

2:30 PM – 2:45 PM **BREAK**

2:45 PM – 4:15 PM **JUDICIAL REVIEW OF RULES**

#### **“Inside Government”**

**H. Thomas Byron, U.S. Department of Justice, Assistant Director, Appellate Staff, Civil Division, Washington, DC**

#### **“Outside Government”**

**Megan Brown, Partner, Wiley Rein, Washington, DC**

This panel will provide an introductory/refresher course on judicial review of rulemaking. The panel will present government and private practice perspectives on procedural and strategic considerations, legal standards and practical constraints applicable to challenging (or defending) regulations in court.

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**TUESDAY – MARCH 15, 2016**

8:00 AM – 8:40 AM     **Registration and Continental Breakfast**

8:40 AM – 8:45 AM     **Welcome and Introduction of Themes**

**John F. Cooney, Program Chair**

8:45 AM – 9:00 AM     **KEYNOTE SPEAKER TBD (NON-CLE)**

9:00 AM – 10:00 AM   **CONGRESSIONAL INTEREST IN REGULATORY REFORM**

**Moderator: Paul Noe, Vice President, Public Policy, American Forest & Paper Association, Washington, DC**

**Panelists:**

**Eric Bursch, Staff Director, Senate Homeland Security and Governmental Affairs Committee, Subcommittee on Regulatory Affairs and Federal Management (Ranking Member Heitkamp (D-ND), Washington, DC**

**Susan Eckerly, Professional Staff, Senate Budget Committee (Chairman Enzi (R-WY)), Washington, DC**

**Daniel Flores, Chief Counsel, House Committee on the Judiciary (Chairman Goodlatte (R-VA)), Washington, DC**

**Satya Thallam, Chief Economist, Senate Homeland Security and Governmental Affairs Committee (Chairman Johnson (R-WI)), Washington, DC**

Congressional interest in regulatory reform, and in adopting statutes that would amend the Administrative Procedure Act and/or codify experience gained during the regulatory process, is at its highest level in a generation. What are the key proposals for reform currently pending before Congress or under consideration? Have we reached an inflection point where consensus on significantly improving the regulatory process can be reached? This Panel will offer the opportunity to hear from and engage with leading members of Congressional staff from both Houses of Congress on this important issue.

10:00 AM – 11:00 AM **THE FUTURE OF DEFERENCE**

**Moderator: Ronald Cass, President, Cass & Associates, Inc., Great Falls, VA; Dean Emeritus, Boston University School of Law**

**Panelists:**

**Jack Beermann, Professor, Boston University School of Law, Boston, MA**

**John Duffy, Professor, University of Virginia School of Law, Charlottesville, VA**

**John Harrison, Professor, University of Virginia School of Law, Charlottesville, VA**

**Neomi Rao, Director, Center for the Study of the Administrative State, George Mason University, Arlington, VA**

More than 30 years after *Chevron USA v. Natural Resources Defense Council*, debate continues among judges as well as scholars, lawyers, administrators, and observers about the concept of “deference” to administrators’ readings of the governing law. Questions remain about the actual content of the *Chevron* test (is it a one-step, two-step, or three-step test? does it apply in important cases or only run-of-the mill ones?), what triggers its application, and what exceptions limit its application. Argument also has focused on its consistency with the APA and its advisability as a guide for judicial review. Recent decisions and commentary have raised additional questions about the notion of deference, not least whether the Supreme Court now views deference as something that applies only to lower courts or only in cases regarded as less significant. A roundtable panel of experts will discuss what the courts will do with deference, how it will play out in the future, and what the effect of predicted changes will be.

11:00 AM – 11:10 AM **BREAK**

11:10 AM – 11:40 AM **THE ROLE OF OIRA IN THE REGULATORY PROCESS: A DISCUSSION WITH OIRA ADMINISTRATOR HOWARD SHELANSKI (NON-CLE)**

**Moderator: Jeffrey A. Rosen, Partner, Kirkland & Ellis LLP, Washington, DC**

**Speaker: Howard Shelanski, Administrator, Office of Information and Regulatory Affairs (OIRA), Office of Management & Budget (OMB), Washington, DC**

For 35 years, OIRA has provided centralized coordination and review of rules issued by Executive agencies and reviewed cost-benefit analysis of major rules. The current period is especially significant, as OIRA has reviewed many rules of great importance, notably in the environmental, labor, and transportation areas. OIRA also will play an important role in the final regulatory actions by the Obama Administration before it leaves office. Howard Shelanski, the Administrator of OIRA, will answer questions about the major challenges and accomplishments of the agency during his term as Administrator. Jeffrey Rosen, Chair of the Section on Administrative Law and Regulatory Practice, will present the questions.

11:40 AM – 12:40 PM **THE EIGHTH YEAR – OIRA AND THE TRANSITION**

**Moderator: Michael Fitzpatrick, Head of Regulatory Advocacy and Senior Counsel, General Electric, Washington, DC; *former Deputy Administrator, Office of Information and Regulatory Affairs (OIRA), Office of Management & Budget (OMB)***

**Panelists:**

**Susan Dudley, Director, GW Regulatory Studies Center and Distinguished Professor of Practice, Trachtenberg School of Public Policy & Public Administration, George Washington University, Washington, DC**

**Sally Katzen, Professor of Practice and Distinguished Scholar in Residence, New York University School of Law, New York, NY; Senior Advisor, Podesta Group, Washington, DC**

**Robert Perciasepe, President, Center for Climate and Energy Solutions, Arlington, VA**

After the November elections, a transfer of authority between two Administrations will occur, with significant consequences in the regulatory arena. Whether the new President is a Democrat or a Republican, legal and policy issues will arise concerning “midnight regulations” issued by the departing Administration and efforts by the incoming Administration to reconsider those rules and to develop and implement its own regulatory policy. The Office of Information and Regulatory Affairs will be involved in many of these decisions on behalf of both Administrations. This Panel will explore the role of OIRA and the regulatory agencies over the course of the final year and into transition, focusing on the issues that are likely to arise in the regulatory space during this supercharged process.

12:40 PM – 1:15 PM **LUNCH BREAK**

1:15 PM – 1:45 PM **CONGRESSIONAL SUPERVISION OF EXECUTIVE LAWMAKING: ENDS AND MEANS IN ADMINISTRATIVE LAW REFORM (NON-CLE)**

**Speaker: Christopher DeMuth, Distinguished Fellow, Hudson Institute, Washington, DC; *Former Administrator, Office of Information and Regulatory Affairs (OIRA), Office of Management & Budget (OMB)***

Congress is considering revising the Administrative Procedure Act in response to recent, bold innovations in executive lawmaking. But reform proposals similar to the current ones—to make agency procedures more formal and trial-like, and to subject agency decisions to stricter judicial review—are as old as the APA itself, and essentially all of them have failed to be enacted. Efforts to strengthen congressional supervision of executive lawmaking have been similarly fruitless. Former OIRA Director Christopher DeMuth will discuss how if today’s reform movement is to succeed, it needs to confront the reasons for previous failures. Its aim should be to resurrect rule-of-law disciplines in the modern administrative state in ways that are compatible with the political incentives of the modern Congress.

1:45 PM – 1:50 PM **BREAK**



1:50 PM – 2:50 PM

## **BALANCE THROUGH POWER: EFFECTIVE CONGRESSIONAL OVERSIGHT OF THE EXECUTIVE BRANCH**

**Moderator: Michael Bopp, Partner, Gibson Dunn, Washington, DC**

### **Panelists:**

**Brian Callanan, Staff Director & General Counsel, Senate Permanent Subcommittee on Investigations, Committee on Homeland Security and Governmental Affairs, Washington, DC**

**Jason Foster, Chief Investigative Counsel, Senate Committee on the Judiciary, Washington, DC**

**Susanne Sachsman Grooms, Democratic Deputy Staff Director & Chief Counsel, House Committee on Oversight and Government Reform, Washington, DC**

**Zachary Shrakzam, Investigations Counsel and Senior Advisor, U.S. Department of State, Washington, DC**

Congressional oversight, when effective, is an antidote for Executive Branch overreach. If Congress has access to the information it needs to scrutinize Executive rulemaking and other actions, it can ensure a disciplined process through the powerful tools of congressional hearings and reports. But does Congress have the access it needs? And where is the line between the right amount of access and overly-intrusive congressional oversight that can chill the deliberations that produce thoughtful and societally-beneficial rules, programs and other actions? We will explore congressional oversight, whether and under what circumstances it works, appropriate limits on such oversight, and changes that might make it more effective.

2:50 PM – 3:00 PM

## **BREAK**

3:00 PM – 4:00 PM

## **ENHANCING RETROSPECTIVE REVIEW OF AGENCY RULES**

**Moderator: Reeve Bull, Research Director, Administrative Conference of the United States (ACUS), Washington, DC**

### **Panelists:**

**Lori Benneer, Associate Professor of Environmental Economics and Policy, Duke University, Durham, NC**

**Neil Eisner, Adjunct Professor, American University School of Law, Washington, DC**

**Sofie Miller, Senior Policy Analyst, George Washington University Regulatory Studies Center, Washington, DC**

Federal agencies' rulemaking efforts have traditionally concentrated almost exclusively on adopting new rules. Rules, however, may become outdated over time. Ideally, agencies

would periodically revisit the rules on the books to identify those that should be eliminated or modified. Despite prompting by the President, most agencies have not developed a culture of retrospective review. Few agencies have comprehensive programs for periodically reevaluating existing rules, planning for retrospective review when adopting new rules, and learning from ex post evaluations to promote more effective ex ante regulatory analysis. This Panel will examine existing approaches to retrospective review (including not only “best practices” at federal agencies but also innovations that have emerged in the states and in foreign countries), assess what has worked well (and what hasn’t), and explore proposals for implementing a durable program of retrospective review in the federal government.

4:00 PM – 5:00 PM

**WARNING LETTERS AND VOLUNTARY COMPLIANCE PROGRAMS – IS *SACKETT v. EPA* A GAME CHANGER?**

**Moderator: Judith R. Starr, Co-Chair, DC Bar Administrative and Agency Practice Section; General Counsel, Pension Benefit Guaranty Corporation, Washington, DC**

**Panelists:**

**William Funk, Professor, Lewis and Clark Law School, Portland, OR**

**Thomas Lorenzen, Partner, Crowell and Moring LLP, Washington, DC**

**Stephanie Tsacoumis, General Counsel, Consumer Product Safety Commission, Bethesda, MD**

Warning letters, which advise regulated entities of violations to achieve voluntary compliance, generally have been found to be non-final agency actions not subject to judicial review under the Administrative Procedure Act. In *Sackett v. EPA*, the Supreme Court held that a pre-enforcement compliance order for which there was no avenue for relief and had serious collateral consequences, was final agency action subject to judicial review. Do similarities between compliance orders and at least some types of warning letters justify extending *Sackett* to such cases?

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