Journal of Benefit-Cost Analysis (2025), 16: S2, 150–151
doi:10.1017/bca.2025.10032

CAMBRIDGE UNIVERSITY PRESS

INTRODUCTION

Regulatory Impact Analysis Guidelines: Introduction to Special Issue

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Keywords: benefit-cost analysis; best practices; regulatory impact analysis

JEL Codes: D6; H4

Abstract
This article provides a brief Introduction to this special *Journal of Benefit–Cost Analysis* issue dedicated to comments filed by former presidents of the Society for Benefit Cost Analysis and editors of this journal on the Office of Management and Budget's draft Circular A–4 on regulatory impact analysis guidelines.

This is an unusual issue of the *Journal of Benefit–Cost Analysis* in that each of the articles (except for the last one) was initially submitted as a public comment to the Office of Management and Budget (OMB) on its proposed revisions to the federal government's guidance on conducting regulatory impact analysis, "Circular A-4."

OMB issued draft revisions to Circular A-4 in June 2023. Its request for comment yielded almost 4,500 submissions, but most of those were associated with mass comment campaigns, followed a template, and shared identical or nearly identical content (Xie *et al.*, 2023). The comments OMB received included 185 unique submissions that contained substantive content. In addition to this public request for comment, OMB solicited peer review comments from a select group of experts on specified issues. In November 2023, OMB released a final Circular; however, in February 2025, OMB revoked it and reinstated the 2003 Circular.

Several former presidents of the Society for Benefit–Cost Analysis and editors of the *Journal of Benefit–Cost Analysis* provided input on the draft Circular, either as peer reviewers or through public comments. In addition, all former SBCA presidents sent a letter to OMB commenting on the draft guidelines. Because elected presidents of the Society for Benefit–Cost Analysis and editors of this Journal bring unique expertise on the subject of regulatory impact analysis, this issue reproduces their comments as submitted. In addition, each author has supplemented their original submission with a prologue and/or epilogue.

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https://doi.org/10.1017/bca.2025.10032 Published online by Cambridge University Press

The Society for Benefit–Cost Analysis does not take institutional positions on issues, and these articles reflect the views of their respective authors.

The issue begins with an August 2023 letter from all the former presidents of the Society and several of the editors of the Journal to OMB's Administrator of the Office of Information and Regulatory Affairs, Ricky Revesz. In the second article, Glenn Blomquist provides a synopsis of feedback on key issues from OMB's selected panel of peer reviewers and compares that to the final 2023 Circular. Articles by each of the former SBCA and JBCA officials follow, in order of their service. A final article, by Febrizio, Hay, and Xie, provides a comparison of the draft and final Circulars.

1. Letter from former SBCA Presidents and JBCA editors
2. Glenn Blomquist* (SBCA 2022, JBCA)
3. Joseph Cordes* (SBCA 2012)
4. Lisa Robinson (SBCA 2014)
5. W. Kip Viscusi* (SBCA 2015)
6. Donald Kenkel (SBCA 2018)
7. Susan Dudley (SBCA 2016)
8. Dale Whittington (SBCA 2021)
9. Glenn Blomquist* (SBCA 2022, JBCA)
10. Scott Farrow* (JBCA)
11. Febrizio, Hay & Xie Comparing the Draft and Final Circular A-4

* indicates invited peer reviewer.

References

Xie, Zhoudan, Sarah Hay, and Henry Hirsch. 2023. "*Care to Comment? Topics Discussed in Revised Circular A4 Public Comments.*" Regulatory Policy Commentary, the George Washington University Regulatory Studies Center. https://regulatorystudies.columbian.gwu.edu/care-comment-topics-discussed-revised-circular-a4-public-comments.

Cite this article: Dudley, Susan E., and Thomas Kniesner. 2025. "Regulatory Impact Analysis Guidelines: Introduction to Special Issue." *Journal of Benefit-Cost Analysis* 16: 150–151, doi:10.1017/bca.2025.10032

https://doi.org/10.1017/bca.2025.10032 Published online by Cambridge University Press