



CONSORTIUM FOR CITIZENS  
WITH DISABILITIES

## **PUBLIC HEALTH REGULATIONS AND DISABILITY PREVENTION**

*Transition of federal administrations should preserve regulations that prevent diminish health of Americans that can lead to disability.*

A forum was held by the Center for American Progress on deregulations by agencies on public health issues associated with transitions of administrations related to social determinants of health. Presentations were made by representatives from the Center for American Progress and OMB Watch.

### **Summary**

When Federal administrations change as a result of presidential elections, there are rushes to change and finalize rules that can impact on people's health. To cope with these attempted rules changes made in administrative transitions, they can be voted down by the new Congress under the Congressional Review Act. Other choices are 1) have executive agencies pull unpublished rules sent to Public Register 2) suspend effective dates of final regulations that have not taken effect, 3) settle certain lawsuits challenging "transition regulations", and 4) use the Congressional Review Act to repeal transition rules that have taken effect. It was suggested there be modest and feasible reform to the "Administrative Procedure Act"

### **Disability Prevention Issue**

Many rules changes that are attempted during administrative transitions have public health implications with the potential for diminishing health of people in America that may contribute to disability. "Transition Regulations are spread across Federal departments that have responsibilities to prevent diminished health and disability. These departments include Health and Human Services, Labor, Interior, Homeland Security, Transportation, Agriculture, and Commerce, Food and Drug Administration and the Environmental Protection Agency.

Most of these public health functions are non-reimbursable medical services that are not a part of health care delivery. A less than adequate public health system may, in part, be the cause of poor U.S. health outcomes where the U.S. is 46<sup>th</sup> in the world in life expectancy, 42, on infant mortality, 37<sup>th</sup> of quality life years. Regulations that protect people from diminished health need to be considered during transition of administrations of the Federal government.

**Intervention**

A letter was written to the keynote speaker of the forum on the adverse impact of deregulation of the prior administration on public health of people in America that does little to prevent diminish health which can contribute to disability.

**Recommendation**

Transition of federal administrations should preserve regulations that prevent diminish health of Americans that can lead to disability.