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INDEX OF TOZZI PAPERS

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- LII 1 1-2 Agenda for Meeting of the NAPA Panel on Executive Organization and Management. Dated: 6/6/85. Subj: List of panel members (Tozzi is included on the Panel on OMB Control of Regulatory Policy Making).
- LII 2 1 National Academy of Public Administration Standing Panel on Executive Organization and Management Panel Session on OMB Control of Regulatory Policymaking. Dated: 6/6/85. Subj: List of members on the panel includes Jim Tozzi.
- LII 3 1 Letter from Robert S. Gilmour, Professor, University of Connecticut, to Jim J. Tozzi, Director, Multinational Business Services. Dated: 5/23/85. Subj: "I am delighted that you will be able to join Alan Morrison and me for a panel discussion on 'The Role of OMB and Regulatory Policymaking' at the annual meeting of the National Academy of Public Administration on Thursday, June 6.
- LII 4 1 Inside EPA: "NY May Seek Court Reversal of EPA Plan to Deny CAA Interstate Petitions". Dated: 9/7/84. Subj: "New York attorney general Robert Abrams has threatened to take EPA to court unless it drops a proposal to deny Clean Air Act interstate transport petitions filed by New York, Pennsylvania and Maine. EPA last week proposed to deny the petitions--which call for major reductions in sulfur dioxide emissions from the Midwest to control acid rain impacts in the Northeast--on the grounds that the northeastern states 'have made a persuasive technical case' that existing CAA requirements are being violated."
- LII 5 1-2 The Wall Street Journal: "Reaganites Find Plans For Deregulation Stall After EPA Revelations". Dated:---. Subj: Tozzi and his involvement in the Reyes Syndrome problem are explained.
- LII 6 1-2 Regulatory and Legal Developments: "OMB, USTR Cooperating to Link Deregulation With Trade Talks". Dated: 5/3/83. Subj: "For the first time, U.S. trade negotiators are being informed routinely of proposed regulatory changes in this country which are 'trade sensitive.'" "The father of the new program is Jim Tozzi, deputy Administrator, of the office of Information and Regulatory Affairs at the Office of Management and Budget."

<u>Volume</u>	<u>Document</u>	<u>Pages</u>	<u>Notes</u>
LII	7	1-5	Report by Jim J. Tozzi, Deputy Administrator, OIRA. Dated: May 1983. Subj: "Of all the agencies and offices through which the Federal Government searches for ways to open up foreign markets to U.S. goods, OMB's Office of Regulatory Affairs is probably the last one anyone would choose to look at. But the fact is that as a result of the Administration's deregulation efforts, a new bargaining tool has surfaced--one with tremendous potential for one-on-one negotiation. And one which needs to be explored fully as a supplement to multilateral trade negotiations.
LII	8	1	Memorandum from JNH to All Lawyers and Jim Tozzi. Dated: 6/24/83. Subj: Buckslip for use with Multinational Business Services, Inc.
LII	9	1-3	Memorandum of Agreement: Treasury and OMB Implementation of Executive Order 12291. Dated: 4/29/83. Subj: Guidelines for implementation of E.O. 12291 signed by Peter J. Wallison, General Counsel, Department of the Treasury, and Chris DeMuth, Administrator, OIRA.
LII	10	1-8	E.O. 12291 Awareness and Plans Survey XVII prepared by CONSAD Research Corporation. Dated: 6/9/83. Subj: Summaries of fourteen Regulatory Relief Surveys.
LII	11	1-7	Regulatory News Clips Received Week of November 9, 1983.
LII	11A	2	<u>Pittsburgh Post-Gazette</u> : "Secret deals called threat to regulation". Dated: 10/13/83. Subj: "At least 35 unpublicized meetings between industry representatives and appointees of President Reagan have affected decisions by federal health and safety agencies, a private research institute charged yesterday." A 107 page study on regulations accused OMB of "secret and imbalanced involvement" where they lack expertise.
LII	11B	3	<u>The Evansville Courier</u> : "OMB being used to sift new federal rules". Dated: 10/11/83. Subj: Two instances of OMB trying to protect industry from government agencies are used as examples to show that regulation is becoming another branch of government.

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LII	11C	4	<u>North Platte, Nebraska Telegraph</u> : "Aide says White House helped industries thwart EPA". Dated: 9/28/83. Subj: "Former EPA chief Anne Burford's top aide told Congress Tuesday that White House officials stifled agency regulatory efforts, even warning 'there was a price to be paid' when she bucked them and approved a set of anti-pollution rules."
LII	11D	5	<u>Riverside, Calif. Press-Enterprise</u> : "Official says firms given EPA plans". Dated: 9/28/83. Subj: A former EPA employee said the Reagan Administration had told companies regulated by EPA about regulations before they were issued.
LII	11E	6-7	<u>Boulder, Colorado Camera</u> : "Official says OMB 'leaked' regulations". Dated: 9/28/83. Subj: "The Office of Management and Budget leaked pending environmental regulations to affected corporations and pressured the Environmental Protection Agency to adopt the changes industry wanted, a former high EPA official told a House subcommittee Tuesday."
LII	12	1-10	Regulatory News Clips Received Week of October 28, 1983.
LII	12A	2	<u>Louisville, Kentucky Times</u> : "Lessons of EPA tempest". Dated: 9/30/83. Subj: "Testimony before a House investigative committee is confirming the worst suspicions about the Reagan administration's effort, temporarily successful, to emasculate the Environmental Protection Agency."
LII	12B	3	<u>The Baltimore Sun</u> : "Hot-Wiring the EPA". Dated: 9/30/83. Subj: Anne M. (Gorusch) Burford, who on March 9 left her post as administrator of the federal Environmental Protection Agency in semi-disgrace, may have been a fall guy. That's one conclusion that can be drawn from testimony of her former staff chief, John E. Daniel, before a House subcommittee. The testimony indicates the real villain may have been the Office of Management and Budget. Mr. Daniel insisted that Mrs. Burford actually resisted OMB importunings to ease up on enforcement of environmental rules in response to industry pressures."

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LII	12C	3	<u>Buffalo Evening News</u> : "Administration Shifts Gears on Curbing Pesticide". Dated: 10/4/83. Subj: "The Reagan Administration is quickly resurrecting a proposal it once wanted scrapped that would limit worker exposure to the cancer-causing pesticide EDB. The decision, confirmed by the Occupational Safety and Health Administration and the Office of Management and Budget, marked a fast turnabout, in administration policy on regulating the powerful carcinogen used on a wide variety of citrus and vegetable crops.
LII	12D	4	<u>Burrelle's TV Clips</u> : September 28, 1983, 7:00-9:00 AM, <u>The Today Show</u> , on NBC. Subj: Anne Burford's resignation and the negative publicity OMB received.
LII	12E	5-6	<u>San Francisco Chronicle</u> : "EPA Aide Says White House Meddled in Rule-Making". Dated: 9/28/83. Subj: Anne Burford was going to testify, saying that the white house should release documents to congress in order to prove OMB threatened the EPA.
LII	12F	7-8	<u>The Sacramento Bee</u> : "House panel told OMB pressured EPA, leaked data to firms". Dated: 9/28/83. Subj: "The Office of Management and Budget leaked pending environmental regulations to affected corporations and pressured the Environmental Protection Agency to adopt the changes industry wanted, a former high EPA (Anne Burford) official told a House subcommittee yesterday."
LII	12G	9	<u>Orlando Sentinel</u> : "Witness claims budget agency muscled EPA". Dated: 9/28/83. Subj: "Former EPA Chief Anne Burford's top aide told Congress Tuesday that White House officials stifled agency regulatory efforts, even warning 'there was a price to be paid' when she bucked them and approved a set of anti-pollution rules."

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LII	12H	10	<u>Los Angeles Times</u> : "EPA Faced `Immense' White House Pressure, Panel Told". Dated: 9/28/83. Subj: OMB threatened the EPA if they approved certain antipollution rules.
LII	13	1	<u>The Washington Monthly</u> : Who's Who in the Administration. Dated: November 1983. Subj: "Last September when Anne Gorsuch's former staff chief, John Daniel , was testifying on the Hill about the EPA's friendliness to industry, one name that repeatedly came up was that of Jim Tozzi . Tozzi is the prime suspect as the man at OMB responsible for leaking a number of pending regulations to industry. Where do you suppose Jim Tozzi is now? Why, he's left government and founded his own consulting firm. Some enterprising Woodstein might look into whether there are similarities between the companies he allegedly helped and those who are now buying his services."
LII	14	1-2	<u>Inside the Administration</u> : "Speaking Out: Jim Tozzi--on Reagan Cancer Policy". Dated: 6/17/83. Subj: Tozzi writes an article about Reagan's cancer policy, saying that a federal cancer policy will address "the issues inherent in risk management--not risk assessment--a 180 degree turn from the direction we pursued in the past."
LII	15	1	<u>Austin American Statesman</u> : "Cancer risk estimates raise fairness question". Dated: 10/23/83. Subj: How much should industry be restricted when it comes to numbers as small as one in a trillion.
LII	16	---	Document is not available.
LII	17	1-2	<u>Inside the Administration</u> : "OMB Raises Concern That EPA May be Overregulating TSCA New Chemicals". Dated: 11/18/83. Subj: Chris DeMuth said that the EPA was regulating chemical exposure "down to a `no effects' level of risk--making `worst case' assumptions in each stage of analysis and adding a `safety factor' at the end."
LII	18	1-3	<u>OSHA Reporter Highlights of Current Report</u> : Page 571.

<u>Volume</u>	<u>Document</u>	<u>Pages</u>	<u>Notes</u>
			Dated:11/3/83. Subj: "The Propriety of a Meeting between Leonard Vance, director of health standards for the Occupational Safety and Health Administration, and a Union Carbide official is questioned at a House subcommittee hearing on OSHA's proposed ethylene oxide standard. The meeting occurred shortly before Vance canceled a planned quantitative risk assessment of the reproductive effects associated with short-term exposure to the substance."
LII	19	1-3	<u>Food Chemical News</u> : "OMB Insists on Reviewing All FDA Labeling Regulations". Dated: 11/7/83. Subj: OMB has rejected Dept. of Health and Human Services' attempt to stop all labeling regulations from needing OMB clearance.
LII	20	1-3	OMB Draft Memorandum Outlining Alternative Proposals on Toxic Torts from Jim J. Tozzi, Deputy Administrator, OIRA, to Ad Hoc Group on Toxic Torts. Dated: 1/21/83. Subj: Toxic Torts.
LII	21	1	<u>The Washington Post</u> : "The Damage OMB is Doing" Dated: 11/28/83. Subj: OMB, generally unknown to the public, is becoming too powerful.
LII	22	1	<u>Legal Affairs??</u> : "Law Firms Put Nonlegal Minds to Work". Dated: Law firms are now starting to hire more nonlawyers. A specific example is used.
LII	23	1-2	<u>OSHA Reporter</u> : "House Committee Tables Draft Report Critical of OMB Interference With OSHA". Dated: 10/27/83. Subj: "A draft House subcommittee report critical of the role of the Office of Management and Budget in Occupational Safety and Health Administration rulemaking was permanently tabled Oct. 25 in a vote by the House Government Operations Committee." Republicans tried unsuccessfully to block the passage of "OMB Control of OSHA Rulemaking."
LII	24	1-2	<u>OSHA Reporter</u> . Cover of issue containing document 23.

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LII	25	1-4	<p><u>Inside the Administration</u>: Articles on pages 2 and 3. Page 2--"White House Advisers Divided Over Need for Contingency Tax in FY-85 Budget". Page 3--"OMB, Fearing Loss of Power to Review Agency Rules, Pushes Compromise". Dated: 12/2/83. Subj: Page 2--"The Administrations top three advisers--Feldstein, Regan and Stockman--will meet later this month to update the Administration's economic forecast, with staff members from CEA, OMB and Treasury set to meet within the next two weeks to prepare a proposed economic update for their bosses' approval." Page 3--"The Office of Management and Budget, concerned that Congress may limit OMB's power to review agency regulations when it reauthorizes the Paperwork Reduction Act, reportedly is negotiating a deal whereby Congress would delete the objectionable provision in the bill in return for a letter from OMB Director David Stockman detailing OMB's role under the paperwork review--House leaders expressing concern that OMB has channeled some of this money toward regulatory review. OMB, however, has strenuously objected to the provision, saying it would unnecessarily restrict OMB's flexibility in reviewing paperwork and regulatory actions."</p>
LII	26	1	<p>Letter from Jim J. Tozzi, Director, Multinational Business Services, Inc to Ms. Barbara McQuown, Associate Director. Dated: 12/2/83. Subj: "In accord with our earlier conversation, I am submitting background papers for Dr. Betsy Ancker Johnson. Presently she is the Vice President of General Motors for Environmental Affairs. In this capacity, she has been on the cutting edge of striking a balance between Federal regulatory requirements and the requirements for a competitive auto industry. I believe the President's Commission on Industrial Competitiveness would benefit greatly from her services."</p>
LII	27	1-4	<p><u>Telecommunications Reports</u>: "Office of Management & Budget May Have Significant Effect on FCC Decision on Access Charge Issues". Dated: 9/13/82. Subj: "The Reagan Administration's Office of Management & Budget, approaching the nation's telecommunications infrastructure from the point of view of budget/fiscal planners, may have a significant impact on the way the currently most critical telecommunications policy issue--access to local telephone exchange service of all interexchange services--is resolved, it began to appear last week."</p>

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LII	28	1-2	<u>Business Action Network</u> : "Regulatory Order Deserves Congressional Action" by Jim Tozzi, Deputy Administrator, OIRA. Dated: February 1983. Subj: Tozzi shoots down the idea that E.O. 12291 is a "radical departure" from the policies of the previous four presidential administrations.
LII	29	1-2	<u>Inside the Administration</u> : "Reagan Launches New Overseas Trade Offensive Using Reg Relief as `Carrot'". Dated: 3/25/83. Subj: In an attempt to expand U.S. business overseas, the Reagan Administration will attempt to use it's regulatory relief program as "a bargaining chip."
LII	30	1-3	<u>OSHA Reporter</u> : "NCI Studies of Pesticides, Herbicides, and Cancer Exposure Expected Next Year." Dated: 12/15/83. Subj: "At least two case studies of soft tissue sarcoma and lymphoma and herbicide or pesticide exposure are expected to be completed by the National Cancer Institute next year, according to Shelia K. Hoar of the institute's environmental epidemiology branch."
LII	31	1	<u>The Atlantic Journal and Constitution</u> : "Realism marks new policy on carcinogen regulations". Dated: 12/25/83. Subj: Jim Tozzi said that the Reagan Administration's new policy towards carcinogens was an honest approach, admitting that some people would die.
LII	32	1	<u>The Washington Post</u> : "It's Not a New Regulatory Review". Dated:---. Subj: Response to Nov. 28 editorial. When Reagan came to office, a new system of centralized review was installed.
LII	33	1	<u>Atlantic Journal-Constitution</u> : "White House aid tried to halt FDA ban on dye". Dated: 12/25/83. Subj: When Jim Tozzi was at OMB, he wrote a letter to the Department of Health and Human Services trying to get the FDA not to ban red dye no. 19.
LII	34	1	<u>The West Palm Beach Post</u> : "Chemical Deaths Expected". Dated: 12/25/83. Subj: Story is identical to document #31.
LII	35	1-2	<u>Business Action Network</u> : "House Extends Law--Nixes Regulatory Spending". Dated: December 1983. Subj: The House approved a reauthorization of E.O. 12291 calling for further reductions in paperwork.

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LII	36	---	Supreme Court Case No. 80-1832, Immigration and Naturalization Service v. Chada et al. Appeal from the U.S. Ninth Circuit Court of Appeals. Dated: Argued 2/22/82, reargued 10/7/82, decided 6/23/83. Subj: Chada was in the U.S. on a nonimmigrant student visa. He stayed after it expired and the Attorney General tried to suspend his deportation, but the House vetoed the AG.
LII	37	---	House Report 99-151, Eleventh Report by the Committee on Government Operation together with Additional Views on HHS' Failure to Enforce the Food, Drug, and Cosmetic Act: The Case of Cancer Causing Color Additives. Dated: 6/3/85. Subj: "Over the past two years, the Secretary has reserved the authority to review FDA recommendations to remove from the market several cancer-causing color additives used in foods, drugs, and cosmetics. To date, the Secretary has approved none of these recommendation.
LII	38	1-2	<u>Inside the Administration</u> : "Environmental Group Files Major Suit Challenging OMB Reg Review Power". Dated: 6/6/85. Subj: "The Environmental Defense Fund has filed what observers say is a major challenge to the regulatory review power wielded by the Office of Management and Budget under Executive Order 12291, asking a court for a blanket exemption from OMB review for regulations developed by the Environmental Protection Agency containing a statutory deadline. Observers believe that a strong ruling by the court would pave the way for a broad exemption for all regulations where statutory deadlines are mandated by Congress. E.O. 12291 already contains a an exemption for statutory deadlines, but EDF charges that OMB routinely ignores the exemption."