

Comments on OMB Proposed Risk Assessment Bulletin

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I have read with interest the proposed Risk Assessment Bulletin. I found it comprehensive and informative but was left concerned about the applicable scope of the bulletin. I bring to the discussion a background in quantitative ‘screening-level’ risk assessments particularly in the area of security based risk. My comments will be colored by that background, I am sure.

The bulletin appears to be aimed at risks created by something we do, rather than something that may happen without our actions. Not to be glib but I made the distinction between IUD and IED. The former is clearly in the scope and expectation of the bulletin while the latter, though clearly within the scope of ‘risks to human health, safety and the environment’ is hopefully outside the scope of coverage. I say hopefully outside the scope because I was unable to find a reasonable way to follow the desired rigor specified in the bulletin and provide a Risk Assessment for critical infrastructure within the United States be protected against IEDs. Without strong clarification of the scope, I fear the bulletin will be the basis for inaction in producing critical risk analyses.

In situations where we are not the action party, so called screening-level risk assessments may be the only reasonable methodology but should never be performed with ‘worst case’ assumptions. In fact it is unclear how one creates ‘conservative’ assumptions since this implies an understanding of the norm. However, I would argue that a quantitative assessment is imperative if we are to spend counter-measure dollars wisely.

Finally, I think the quantitative assessment wording “qualitatively and, whenever possible, quantitatively” is weaker than the requirement set forth in Circular A-4 and perhaps sends the wrong message to the preparers.

Assuming I am correct in my interpretation of the scope of coverage and you wish at some later time to discuss Risk Assessments for hazards outside our own creation, I would be happy to discuss ideas on that subject matter as well.

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