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Subject: comment on Guidelines for Regulatory Analysis

Comment on the OMB Draft Guidelines for Regulatory Analysis: The Issue of Age

from John Mendeloff University of Pittsburgh Pittsburgh, PA 15260 jmen@pitt.edu

I would like to suggest that one objective that should guide preventive public health measures is to decrease lifespan inequality. To die at 10, 20, 40, or 50--this is surely one of the most profound inequalities of all. Those who die young miss out on many of the richest life experiences: finding a partner, raising children, practicing a skill or profession.

If you were to assert that extending my life deserved the same priority as extending the life of my 19 year old daughter, I would strongly disagree. I suspect that most parents and grandparents would as well. There is survey data that show that, when people are asked at what age death is most tragic, most put a premium on the deaths of younger individuals.

Despite these feelings, most older citizens are also, I suspect, upset at the prospect of losing respect and status as they lose their traditional work roles and often become more frail and isolated. It is not surprising that these fears can be aroused by warnings that, when it comes to lifesaving, there is a "senior discount."

The emphasis on reducing lifespan inequality helps all of us to acknowledge that there are good reasons to support a "youth premium." This rationale for a distinction is not based on economic productivity. It therefore has the advantage that it can not be used to discriminate against the disabled.