



Representative Roger Williams
Chairman
House Committee on Small Business
Washington, DC 20515

Representative Nydia Velázquez
Ranking Member
House Committee on Small Business
Washington, DC 20515

November 18, 2025

Dear Chairman Williams and Ranking Member Velázquez:

The Coalition for Sensible Safeguards (CSS),¹ an alliance of over 220 labor, scientific, research, good government, faith, community, health, environmental, and public interest groups, is writing regarding consideration of the Destroying Unnecessary, Misaligned, and Prohibitive (DUMP) Red Tape Act of 2025. H.R. 4305. This bill would establish an email address (called a “hotline”) and a website through which small businesses can notify the Small Business Administration (SBA) Office of Advocacy of regulatory compliance burdens. We urge opposition to this bill, which will likely benefit large corporations even more than it will benefit many small businesses.

While we generally support efforts to engage members of the public in the rulemaking process, this bill is one-sided in its scope. Small businesses do not always oppose regulations or desire to see them weakened. In fact, small businesses often support regulations because they provide a level playing field on which to compete with larger corporations that would otherwise dominate the market. Small businesses also tend to support agency guidance and policy documents that provide plain-language explanations on what is expected to reduce hazards and avoid citations and penalties. In addition, small businesses already receive unique opportunities to provide input on rules and other actions that the public does not receive. Yet this bill seeks only information from some small businesses about so-called burdens, rather than seeking to understand how regulations affect small businesses — both the good and bad.

This one-sided nature of the bill creates the impression that it is more focused on advancing an ideological attack on regulations than actually helping small businesses. This problematic impression is only further reinforced by the bill’s unfortunate name.

The bill requires that the Chief Counsel for Advocacy at the SBA Office of Advocacy submit an annual report to the SBA Administrator and to Congress that includes rules that appear most

¹ This document represents the expert consensus of the Coalition for Sensible Safeguards Executive Committee and does not necessarily reflect the views of each member organization.

frequently in submissions, a summary of notifications received, and recommendations for each regulatory agency that issued the rules, as well as actions taken by the Chief Counsel to address the rules. However, the bill fails to define the term “rule” for purposes of this bill, meaning it potentially covers a wide swath of agency guidance and policy statements that are not legally binding. This would divert resources from other work the Office of Advocacy is tasked with doing to support small businesses.

The bill allows hotline submissions from “small business concerns,” as defined in section 3 of the Small Business Act. But the SBA Office of Advocacy is also responsible for representing small business organizations and small governmental jurisdictions under the Regulatory Flexibility Act, 5 U.S.C. 601(3-6). Thus, all small entities within Advocacy’s purview do not seem to be contemplated by the bill. Small organizations and governments should be able to use the hotline as well, if the purpose of this legislation is to gather full information about how regulations affect small entities.

Further, the bill should contain disclosure requirements so that an entity submitting a complaint to the hotline would be required to indicate whether (and by whom) they received support in preparing their hotline submission. It is well documented that big businesses and large trade associations often prepare comments and talking points for so-called small entities to submit to the SBA Office of Advocacy. Congress and the public have a right to know if the hotline becomes just another avenue for big corporations to improperly influence the regulatory process.

Since H.R. 4305 is so biased, anti-regulatory, and fails to consider the benefits of regulation; does not include all small entities within the jurisdiction of the SBA Office of Advocacy; and does not require disclosure about potential conflicts of interest and influence of submitters, we urge opposition to this bill.

We encourage the committee to focus on other government policies from the current Administration that have directly harmed small businesses rather than misguidedly target regulations that protect the public. The rollback of regulations under the current Administration has not improved the economy nor lowered prices for consumers and working families.

We stand ready to work with the committee on real solutions for enhancing small business engagement in the rulemaking process.

Sincerely,

A handwritten signature in black ink, reading "Rachel Weintraub" with a stylized flourish at the end.

Rachel Weintraub, Executive Director
Coalition for Sensible Safeguards

CC: Members of the House Committee on Small Business