

Bridget C.E. Dooling

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ACADEMIC APPOINTMENTS

Current Appointment

- The Ohio State University, Michael E. Moritz College of Law
 - Assistant Professor (June 2023 – Present)
 - Service: Appointments Committee (AY 2023)

Previous Appointments

- The George Washington University Law School
 - Professor of Law (by courtesy) (2022 – 2023)
 - Professorial Lecturer of Law (2022 – 2023)
- The George Washington University, Regulatory Studies Center
 - Research Professor (2018 – 2023)
- George Mason University School of Law
 - Adjunct Professor (2009 – 2015)

COURSES

- Legislation & Regulation (1L) (Fall 2022, Spring 2024, Spring 2025)
- Administrative Law (Fall 2023, Spring 2025)
- Regulatory Practicum (Spring 2009 – Spring 2015)

PUBLICATIONS

Published & Forthcoming Articles

- [Regulatory Body Shops](#), 73 DUKE L.J. (forthcoming 2024) (with Prof. Rachel A. Potter)
 - Selected for Duke Law Journal's 54th Administrative Law Symposium
 - Reviewed by Prof. Chris Walker for [JOTWELL](#) (2023)
- Competing Narratives in OIRA Review of Tax Regulations, J.L. ECON. & POL'Y (forthcoming 2024) (with Prof. Kristin E. Hickman)
- [Applying the Regulatory Report Card to Tax Rules](#), 13 J. BENEFIT-COST ANALYSIS (forthcoming 2024) (with Prof. Kristin E. Hickman)*
- [Adoption of Methadone Take Home Policy by U.S. State Opioid Treatment Authorities During COVID-19](#), 124 INT'L J. DRUG POL'Y 104302 (2024) (with Victor Roy, Michele J. Buonora & Caty Simon & Prof. Paul Joudrey)*†
- [Pandemic telehealth flexibilities for buprenorphine treatment: a synthesis of evidence and policy implications for expanding opioid use disorder care in the United States](#), 1 HEALTH AFFAIRS SCHOLAR doi:10.1093/haschl/qxad013 (2023) (with Prof. Noa Krawczyk, Bianca D. Rivera & Carla King)*†

- [Beyond Republicans and the Disapproval of Regulations: A New Empirical Approach to the Congressional Review Act](#), 20 J. EMPIRICAL LEGAL STUD. 472 (2023) (with Prof. Steven J. Balla & Daniel Pérez)*†
- [Synthesising evidence of the effects of COVID-19 regulatory changes on methadone treatment for opioid use disorder: implications for policy](#), 8 LANCET PUB. HEALTH E238 (2023) (with Prof. Noa Krawczyk, Bianca D. Rivera & Emily Levin)*†
- [Methadone’s Regulatory Thicket](#), 32 ANNALS HEALTH L. 191 (2023) (with Laura E. Stanley)†
- [Rulemaking by Contract](#), 74 ADMIN. L. REV. 703 (2022) (with Prof. Rachel A. Potter)
- [Responding to Mass, Computer-Generated, and Malattributed Comments](#), 74 ADMIN. L. REV. 95 (2022) (with Prof. Steven J. Balla, Reeve Bull, Prof. Emily Hammond, Prof. Michael Herz, Prof. Michael Livermore & Prof. Beth Simone Noveck)
- [Extending Pandemic Flexibilities for Opioid Use Disorder Treatment: Authorities and Methods](#), 106 MINN. L. REV. HEADNOTES 74 (2021) (with Laura E. Stanley)†
- [Into the Void: GAO’s Role in the Regulatory State](#), 70 AM. U. L. REV. 387 (2020)
- [Bespoke Regulatory Review](#), 81 OHIO ST. L.J. 673 (2020)
- [OIRA’s Expanded Review of Tax Regulations and Its Surprising Implications](#), 3 BUS. ENTREPRENEURSHIP & TAX L. REV. 224 (2019)
- [Legal Issues in E-Rulemaking](#), 63 ADMIN. L. REV. 893 (2011)
- [Take It Past The Limit: Regulatory Takings of Personal Property](#), 16 FED. CIR. B.J. 445 (2008)
- [An Orphan Works Affirmative Defense to Copyright Infringement Acts](#), 12 MICH. TELECOMM. TECH. L. REV. 75 (2005) (with Jerry Brito)

* Peer-reviewed journal † Student co-author

Reports

- [Robotic Rulemaking](#), Brookings Institute (Apr. 4, 2023) (with Mark Febrizio)
- [A Vast and Extensive Regime: Federal Regulation of Methadone as a Treatment for Opioid Use Disorder](#), Regulatory Studies Center (Aug. 11, 2022) (with Laura E. Stanley)
- [Contractors in Rulemaking](#), Report for the Administrative Conference of the United States (May 9, 2022) (with Prof. Rachel A. Potter)
- [An overview of Biden’s first regulatory year](#), Brookings Institute (Jan. 20, 2022)
- [Mass, Computer-Generated, and Fraudulent Comments](#), Report for the Administrative Conference of the United States (June 2021) (with Prof. Steven J. Balla, Reeve Bull, Prof. Emily Hammond, Prof. Michael Herz, Prof. Michael Livermore & Prof. Beth Simone Noveck)
- [Where are the Congressional Review Act disapprovals?](#), Brookings Institute (Mar. 24, 2021) (with Daniel Pérez and Prof. Steven J. Balla)
- [Extending Pandemic Flexibilities for Opioid Use Disorder Treatment](#), Regulatory Studies Center (support from The Pew Charitable Trusts) (with Laura E. Stanley)
 - [Unsupervised Use of Opioid Treatment Medications](#) (Apr. 22, 2021)
 - [Telemedicine & Initiating Buprenorphine Treatment](#) (Feb. 23, 2021)
- [The regulatory savvy of Biden’s early executive actions](#), Brookings Institute (Jan. 26, 2021)
- [GAO’s role in the regulatory state](#), Brookings Institute (Mar. 17, 2020)
- [Accounting for regulatory reform under Executive Order 13771](#), Brookings Institute (Nov. 7, 2019) (with Mark Febrizio and Daniel Pérez)
- [Spotlight: HHS Entries in OIRA’s Latest Regulatory Reform Report](#), Regulatory Studies Center Insight (Nov. 26, 2018)

- [Trump Administration Picks up the Regulatory Pace in its Second Year](#), Regulatory Studies Center Insight (Aug. 1, 2018)

Opinion Pieces & Commentaries

- [An Expedited Regulatory Strategy For Expanding Access To Methadone Treatment For Opioid Use Disorder](#), Health Affairs Forefront (May 27, 2022) (with Prof. Richard Bonnie, Prof. Shelly R. Weizman, Prof. Matthew J.B. Lawrence & Corey S. Davis)
- [What the Supreme Court’s Rejection of the Employer Vaccinate-or-Test Rule Means for Biden’s Agenda](#), Lawfare (Jan. 24, 2022)
- [What’s the Status of the Biden Administration’s Workplace Vaccine Mandate?](#), Lawfare (Oct. 21, 2021) (#1 most viewed article on Lawfare in 2021)
- [Bot-Generated Comments on Government Proposals Could Be Useful Someday](#), Slate (June 21, 2021) (with Prof. Michael Livermore)
- [The pandemic broke through opioid treatment red tape. Let’s keep it that way.](#), Philadelphia Inquirer (Mar. 9, 2021) (with Laura E. Stanley)
- [We need a bespoke approach to independent agency regulations](#), The Hill (July 15, 2020)
- [Whether a rule is cruel or kind, regulatory analysis shines a light](#), The Hill (Dec. 13, 2019)
- [The FDA’s Opaque Approach To Breast Density Communications](#), Health Affairs Forefront (Dec. 13, 2019)
- [How independent are government agencies? OMB’s move on ‘major’ rules may tell us](#), The Hill (Apr. 13, 2019)
- [A long shutdown hinders Trump’s deregulatory efforts](#), The Hill (Jan. 10, 2019)
- [The Shutdown’s Rulemaking Ramifications](#), Administrative & Regulatory Law News (Winter 2019)
- [Trump hit the regulatory brakes, but hasn’t found reverse gear](#), The Hill (Aug. 30, 2018)
- [Justice Kennedy’s parting swipe against judges deferring to administrative agencies](#), The Hill (July 9, 2018)
- [Who’s Your Daddy?](#), Wall Street Journal (Mar. 25, 2006) (with Jerry Brito) (on orphan works)

Public Comments

- [Public Interest Comment](#) on DEA’s Telehealth Proposed Rules (Mar. 31, 2023)
- [Public Interest Comment](#) on SAMHSA’s Proposed Rule on Methadone (Feb. 14, 2023)
- [Public Interest Comment](#) on OMB’s Request for Information on Methods and Leading Practices for Advancing Equity and Support for Underserved Communities Through Government (July 2, 2021)
- [Public Interest Comment](#) on FDA’s Proposed Rule on Mammography Standards (June 24, 2019)

Podcasts

- Lawfare Podcast, [Robotic Rulemaking](#) (May 4, 2023)
- RegStudies Podcast
 - [What’s In the EO on Modernizing Regulatory Review?](#) (Apr. 26, 2023)
 - [Will ChatGPT Break the Regulatory Commenting Process?](#) (Jan. 12, 2023)
- Law & Governance, Clubhouse Discussant
 - “The Undemocratic Roots of Agency Rulemaking” by Prof. Emily Bremer (2022)
 - “The Structure of Executive Power” by Prof. Blake Emerson (2022)
 - “Taking Appropriations Seriously” by Prof. Gillian Metzger (2022)
 - “Subordination and Separation of Powers” by Prof. Matthew Lawrence (2022)

- “The Congressional Bureaucracy” by Prof. Jesse Cross and Prof. Abbe Gluck (2021)
- “The Rediscovered Stages of Agency Adjudication” by Prof. Emily Bremer (2021)
- Understanding Congress, [What is the Congressional Review Act?](#) (Nov. 1, 2021)
- Gov Actually, [OMB in Transition](#) (Mar. 5, 2021)
- Gray Matters, [Minutes to Midnight, or Four More Years: The Regulatory Agenda](#) (Aug. 6, 2020)
- Ipse Dixit, [Bespoke Regulatory Review](#) (Feb. 12, 2020)
- Federal Drive, [Shutdown slows momentum of deregulation efforts](#) (Jan. 17, 2019)
- Planet Money, [Trump v. Red Tape](#) (Oct. 19, 2018)
- Federal Drive, [70-percent drop in significant regulations in Trump admin.’s first 18 months](#) (Aug. 16, 2018)

GOVERNMENT SERVICE

- Biden-Harris Presidential Transition Team (2020-2021)
 - Office of Management & Budget Agency Review Team
 - National Archives & Records Administration Agency Review Team
- White House Office of Management & Budget
 - Office of Information and Regulatory Affairs, Senior Policy Analyst & Deputy Branch Chief (2007 – 2018)
 - Office of General Counsel, Attorney (2017 – 2018)
- U.S. Department of Labor, Office of Administrative Law Judges
 - Law Clerk to The Honorable Richard J. Stansell-Gamm (2006 – 2007)
- Loudoun County Circuit Court (Virginia)
 - Law Clerk to The Honorable Thomas D. Horne (Summer 2005)
- U.S. Senate, Committee on the Judiciary
 - Law Clerk, Chief Counsel’s Office (Spring 2005)
- U.S. Department of Justice, Antitrust Division
 - Honors Paralegal, Legal Policy Section, 2002 – 2003

GRANTS

- The Pew Charitable Trusts, Substance Use Prevention and Treatment Initiative
 - Principal Investigator, Regulatory Barriers to Methadone Treatment (2021 – 2023)
 - Principal Investigator, Regulatory Flexibilities for Opioid Addiction Treatment (2020 – 2021)

SELECTED WORKSHOPS, LECTURES & TALKS

Academic Workshops

- Junior Scholars Conference, Northeastern University Law School (2024) (discussing *Ghostwriting the Government*)
- Southeastern Association of Law Schools, Works-in-Progress (2022) (discussing *Regulatory Body Shops*)
- University of Minnesota Squaretable (2022) (discussing *A Regulatory Report Card for Tax Rules*) (with Prof. Kristin E. Hickman)
- Seventh Annual Administrative Law Roundtable, University of Minnesota (2022) (discussing *Regulatory Body Shops*) (competitive)
- American Association of Law Schools, New Voices in Administrative Law (2021) (discussing *Going Through Regulatory Withdrawal*)

- Health Justice: Engaging Critical Perspectives in Health Law and Policy, American University (2020) (discussing the role of public comments in rulemaking) (competitive)
- DC Public Management University Consortium (2020, cancelled due to pandemic) (discussing *Slicing Through Sludge*) (competitive)
- Fourth Annual Administrative Law Roundtable, University of Wisconsin (2019) (discussing *Bespoke Regulatory Review*) (competitive)
- The Future of White House Regulatory Oversight and Cost-Benefit Analysis, Center for the Study of the Administrative State (2019) (discussing *Codifying the Cost-Benefit State*) (competitive)
- American Association of Law Schools, New Voices in Administrative Law (2019) (discussing *The Many Forms of Executive Oversight of Independent Agencies*)

Invited Academic Talks

- Duke University, School of Law, Administrative Law Symposium (invited to discuss *Regulatory Body Shops*) (Mar. 22, 2024)
- The George Washington University, Trachtenberg School of Public Policy & Public Administration, Faculty Research Development Workshop (with Prof. Leah Brooks & Nora Esposito) (invited to present *Bringing Quantitative Tools to de Tocqueville's Conjecture: A Century of Public Participation*) (2022)
- Harvard University, Kennedy School of Government, Regulatory Policy Seminar (invited to present *Bespoke Regulatory Review*) (2021)
- The George Washington University, Trachtenberg School of Public Policy & Public Administration, School Seminar (with Prof. Steven J. Balla) (invited to present *Mass, Bot, and Fake Comments on Rulemaking*) (2021)
- American University, Washington College of Law, Oversight Project (invited to present *Into the Void: GAO's Role in the Regulatory State*) (2020)
- University of Missouri, Law School, Symposium on Effective Regulation (invited to present *OIRA's Expanded Review of Tax Regulations and Its Surprising Implications*) (2019)

Academic Guest Lectures

- Georgetown University, Graduate School of Arts & Sciences, "Integrative Seminar in Addiction Policy & Practice" (Prof. Regina LaBelle) (2022, 2023, 2024)
- University of Notre Dame, Law School, "Regulatory Process" (Prof. Emily Bremer) (2020, 2021 x2, 2023)
- The George Washington University, Trachtenberg School of Public Policy & Public Administration, "Administrative Law for the Regulatory Comment Clinic" (Prof. Susan Dudley) (2019, 2020, 2021, 2022, 2023)
- Princeton University, School of Public and International Affairs, "Legal Skills for Policymakers" (Prof. Martha Coven) (2022)
- Duke University, School of Law and Sanford School of Public Policy, "Risk Regulation" (Prof. Jonathan Wiener) (2021, 2022)
- The George Washington University, Department of Political Science, "Regulatory Reform in the Trump Administration" (Prof. Steven J. Balla) (2019, 2022)
- University of Michigan, Ross School of Business, "The U.S. Regulatory Policy Process" (Prof. Thomas Buchmueller) (2019, 2020, 2022)
- Bowdoin College, Government and Political Science Department, "OIRA and the Politics of Policy Implementation" (Prof. Andrew Rudalevige) (2019, 2020, 2022)

- The George Washington University, Milken Institute School of Public Health, “Federal Policymaking and Policy Advocacy” (Prof. Naomi Seiler) (2019, 2021, 2022)
- University of California San Diego, School of Global Policy and Strategy, “Administrative Law” (Prof. Brian Libgober) (2021)
- University of Virginia, Department of Politics, “Bureaucratic Politics” (Prof. Rachel Potter) (2021)
- University of Minnesota, Law School, “Advanced Administrative Law” (Prof. Kristin Hickman) (2021)
- Rutgers University, Law School, “Regulatory State” (Prof. David Noll) (2020)
- University of Virginia, Department of Politics, “Influencing Public Policy” (Prof. Rachel Potter) (2020)
- University of Pennsylvania, Carey Law School, “Regulatory Law & Policy” (Prof. Cary Coglianese) (2020)

Selected Conference Presentations & Panels

- Association of American Law Schools, Annual Meeting
 - Presenter, Admin Law Section Panel: Politics, Expertise, and Accountability in Regulatory Review (2024)
 - Presenter, Hot Topics Panel: Assessing the Impact of President Biden’s Marijuana Actions (2023)
- American Bar Association, Section of Administrative Law & Regulatory Practice
 - Presenter & Moderator, “Modernizing Regulatory Review” (2023)
 - Moderator, “OIRA Leaders on Biden Administration Regulatory Policy” (2023)
 - Presenter, “Rulemaking Developments” (2018, 2019, 2020, 2021, 2022, 2023)
 - Moderator, “Executive Actions in Emergencies” (2022)
 - Presenter & Moderator, “Executive Orders in Theory and Practice” (2021)
 - Presenter, “Modernizing Public Comment: Potential, Perils, and Pitfalls” (2021)
 - Presenter & Moderator, “White House Oversight 101” (2021)
 - Moderator, “OIRA Administrators on the Next Presidential Term” (2020)
 - Presenter, “Rulemaking 101” (2020, 2019)
 - Presenter, “Regulatory Budgeting” (2019)
- Food & Drug Law Institute / Food & Drug Law Journal
 - Moderator & Discussant, FDA & *Chevron* Deference (2023)
 - Moderator, “The FDCA Impact of *Dobbs*” (2022)
- Society of Benefit-Cost Analysis
 - Presenter, “The Year in Regulation” (2022)
 - Moderator, “Benefit-Cost Analysis of Tax Regulations” (2021)
 - Moderator, “Prospects for Regulatory Analysis: Conversation with Former OIRA Administrators” (2021)
 - Moderator, “Benefit-Cost Analysis of Tax Regulations” (2019)
- GW Regulatory Studies Center
 - Facilitator, “Is OIRA Fit for Purpose?,” Building On Regulatory Foundations (2023)
 - Moderator, “Discussion with OIRA Administrators,” Revising Regulatory Review: Expert Insights on the Biden Administration’s Guidelines for Regulatory Analysis (2023)
 - Presenter, “Applying the Regulatory Report Card to Tax Regulations,” Applied Regulatory Analysis for a Better Tomorrow (2022) (with Prof. Kristin Hickman)
 - Presenter & Moderator, “The Next 100 Years of Regulation,” Past, Present, and Future of Regulation (2020)

- Moderator, “Looking Back,” Executive Order 12,866 25th Anniversary Event (2018)
- Intergovernmental Fora
 - U.S. Expert, “New Tech Tools & Regulation,” World Trade Organization, Committee on Technical Barriers to Trade, Use of Digital Technologies and Tools in Good Regulatory Practices (2023)
 - U.S. Expert, “A New Era for Tech Tools in Regulation,” Asia-Pacific Economic Cooperation, Senior Officials’ Meeting, 16th Conference on Good Regulatory Practices (2023)
- Substance Use Disorder Research Presentations
 - Presenter, “SAMHSA’s Final Rule on Methadone,” Yale Program in Addiction Medicine (2024)
 - Presenter, “The Case for Expanded Methadone Access,” R Street Institute (2024)
 - Presenter, “What have we learned from COVID-19?,” Liberating Methadone, NYU Center for Opioid Epidemiology and Policy (2023)
 - Presenter, “Methadone’s Regulatory Thicket,” National Institute on Drug Abuse, Center for Clinical Trials Network Annual Steering Committee Meeting (2023)
 - Presenter, “Evolving Telehealth Regulations,” Congressional Briefing on Telehealth and Opioid Use Disorder Treatment hosted by The Pew Charitable Trusts on Capitol Hill (2023)
 - Presenter, “SAMHSA’s Proposed Updates to Methadone Rules: Will These Changes Do Enough to Expand Access to Methadone for Opioid Use Disorder?,” Webinar hosted by Yale Program in Addiction Medicine, NYU Langone Center for Opioid Epidemiology and Policy, and Drug Policy Alliance (2023)
 - Presenter, “Statutory Flexibilities for Methadone Regulations,” National Academies of Sciences, Engineering, and Medicine, Workshop on Methadone Treatment for Opioid Use Disorder: Examining Federal Regulations and Laws (2022)
 - Presenter, “Public Health and Legal Implications of Treatment Flexibilities for Substance Use Treatment During and After the COVID-19 Pandemic,” National Association of Attorneys General (2021)
- Immigrant Legal Resource Center
 - Presenter, “Commenting on Immigration Regulations” (2022)
 - Presenter, “The APA and Immigration” (2022)
 - Presenter, “Regulations Demystified for the Immigration Advocate” (2019)
- Center for the Study of the Administrative State, George Mason University
 - Presenter, “OIRA’s Evolving Relationship with IRS,” Future of Financial Regulation (2023) (with Prof. Kristin Hickman)
 - Presenter, “Cost-Benefit Analysis in Court” (2019)
- Presenter, “Beyond the Ivory Tower: Establishing Partnerships with Government,” Midwest Political Science Association (2022)
- Participant, “Cultural Influences in Regulatory Capture,” Tobin Project & Social Science Research Council (2019)
- Presenter, “Regulatory Reform,” Democracy Forward (2019)
- Presenter, “Regulations & Academic Research,” Council on Government Relations (2019)
- Moderator, “White House Coordination of Federal Environmental Policymaking,” American University Washington College of Law (2019)
- Presenter, “Presidential Transition, Deregulation, and the Courts,” Penn State Dickinson (2019)
- Presenter, “Regulatory Change & the Trump Administrative State,” Yale Journal on Regulation Symposium, Yale Law School (2019)

EDUCATION

- George Mason University School of Law (J.D. 2006)
 - Editor-in-Chief, Federal Circuit Bar Journal
- The George Washington University (B.B.A. 2001)

BAR ADMISSION, PROFESSIONAL AFFILIATIONS

- Member, Virginia State Bar (2006 – Present)
- Member, American Bar Association, Section of Administrative Law & Regulatory Practice (2018 – Present)
 - Council Member (2021 – Present)
 - Co-Chair, Administrative Law Conference (2022, 2023)
 - Member, Committee on the Future of Meetings (2023)
 - Recipient, Chair's Award for Outstanding Volunteer Service (2023)
- Senior Fellow, Administrative Conference of the United States (2018 – Present)
 - Consultant: Rulemaking Contractors Project (2021 – 2022)
 - Consultant: Mass, Computer-Generated, and Fraudulent Comments Project (2020 – 2021)
 - Government Member for OMB (2011 – 2018)
 - Special Assistant & In-House Consultant: Legal Issues in E-Rulemaking Project (2010 – 2011)
- Contributor, Yale Journal on Regulation, Notice & Comment Blog (2018 – Present)
 - Organizer, symposium for Prof. Jed Stiglitz's *The Reasoning State* (2022)
 - Organizer, symposium for Prof. Andrew Rudalevige's *By Executive Order* (2021 – 2022)
 - Organizer, symposium for Prof. Rachel Potter's *Bending the Rules* (2019)
- Planning Committee Member, National Academies of Sciences, Engineering, and Medicine
 - Workshop on Methadone Treatment for Opioid Use Disorder: Examining Federal Regulations and Laws (2021 – 2022)
- Member, Food & Drug Law Institute (2011 – Present)
 - Food & Drug Law Journal, Editorial Advisory Board (2012 – 2015, 2020 – Present)
- Member, Society for Benefit-Cost Analysis (2019 – 2023)