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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject: Proposed Peer Review Regulation

12/13/03
Joshua B. Bolten, Director
Office of Management and Budget
725 17th Street, N.W.
NEOB Room 10201
Washington, DC 20503

Dear Director Bolton:

As I scientist, I am very familiar with the peer-review system. Indeed, I am generally a strong proponent of peer review in science. It is a crucial step in the publication of scientific findings. However, the peer-review system proposed by the Office of Management and Budget appears flawed in many ways. A recent workshop of the Nation Academy of Sciences opposed the OMB proposal on many grounds. These include the following:

1)There is no evidence that the current system is not working. Many speakers pointed out that not a single example has been raised demonstrating inappropriate or flawed federal regulations being promulgated as a result of failure to peer review. Do we need more bureaucracy in our government?

2)The OMB Bulletin is unclear and confusing on many points. It is likely, however, that implementation of the proposal will lead to delay, increased and unfunded costs, and confusion. Although the OMB touts the need for cost-benefit analyses in government regulations, there has in this instance been no assessment of the costs of the proposed Bulletin in terms either of diversion of agency resources or delayed regulatory protection.

3)The proposal's conflict of interest requirements appear to be written in a way that will preclude the participation of academic scientists whose work is supported by federal funding, but not exclude industry scientists who work for regulated parties. This appears to promote conflict of interest, not prevent it. Moreover, The proposal appears to exempt a large proportion of regulatory documents where the science emanates from the regulated industry, where many would argue the science is in most need of peer review.

4)Centralizing authority for regulatory scientific peer review in the Office of Management and Budget, an office with few scientists and whose workings are particularly opaque, opens the potential for behind-the-scenes intervention to change policy under the guise of questioning the science.

I urge the Office of Management and Budget to withdraw this proposal, and save taxpayers the money that would be wasted on the excess paperwork.

Sincerely,

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