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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP

cc:

Subject: Comments - Peer Review and Information Quality

Dr. Margo Schwab, Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street NW, New Executive Office Building, Room 10201, Washington, D.C.

Dear Dr. Schwab:

The peer-review process has worked well for the scientific community for a long time but the Office of Management and Budget (OMB) has identified a so-called problem that it intends to solve in a very draconian manner. OMB intends to ensure far greater industry input into the regulatory review process by using the fact that government has traditionally supported the best scientists to cut those scientists out of regulatory reviews. Dr. Anthony Robbins summarized the problem with these proposed rules quite succinctly in the Boston Globe: "To grasp the implications of this radical departure, one must recognize that in the US there are effectively two pots of money that support science: one from government and one from industry...If one excludes scientists supported by the government, including most scientists based at universities, the remaining pool of reviewers will be largely from industry..."

In other words, anyone who ever received a government research grant can be disqualified from peer review. Most of the best, most reputable research scientists depend almost entirely on such grants. According to the proposed rules, if the public supports your research, you are disqualified from drafting regulations to protect the public that supports you and, in fact, includes you.

It is disturbing that these changes are cloaked under the guise of avoiding conflicts of interest, thereby protecting the purity of the peer review process. The fact that the a number of recent legislative proposals concerning peer review are touted as having "bipartisan support" is far more impressive to the politicians themselves than it is to the stakeholders. It simply means that both parties are equally capable of promoting bad science.

I am strongly opposed to the adoption of these rules. Thank you for the opportunity to comment.

Sincerely,
Laine Vignona



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