

Suggestions for improving the Peer Review Process

A rigorous peer review is always going to be an inconvenience for an Agency and contractors preparing work products for that Agency. A rigorous peer review has the very real potential of increasing costs and upsetting schedules. Peer reviewers understand this; they will not be completely independent until they are insulated from the Agency commissioning the peer review and its work product contractors during the peer reviewer selection process.

Peer review should be organized and carried out by a separate contractor chosen by the Agency from a pool of peer review contractors qualified by OIRA based solely upon the contractor's performance in identifying qualified individuals willing to serve on Peer Review Panels and in carrying out the mechanics of conducting face-to-face Peer Reviews. A model for this system is the use of Toxicological Excellence in Risk Assessment (TERA, a non-profit organization based in Cincinnati, Ohio) by Health Canada to conduct face-to-face Peer Reviews for it at a reasonable cost per review.

Under no circumstances should a contractor be allowed to assemble peer reviewers and conduct a peer review of its own work product. A contractor preparing a work product for an Agency and the Agency itself have a clear financial interest in obtaining a "rubber stamp" peer review of that work product. Substantive suggestions for improvement of a work product emanating from a Peer Review Panel will entail additional expenditures on the part of the outside contractor and will most probably interfere with attainment of Agency deadlines for completion of a particular work product. A contractor has an obvious conflict of interest in choosing peer reviewers and conducting a peer review of its own work product.

Under no circumstances should an Agency be allowed to determine which independent contractor is selected to assemble peer reviewers and conduct a peer review for a work product from that Agency. There will be a significant potential conflict of interest in allowing an Agency to choose an independent contractor to organize and conduct peer review of that Agency's work products; contractors who produce "rubber stamp" peer reviews will be favored over the contractors who produce more scientifically valid peer reviews that interfere with keeping work products "on schedule". Independent contractors entrusted with identifying peer reviewers and conducting peer reviews for Agencies must be fully insulated from any suggestion that future contracts might be withheld because of scientifically comprehensive, but bureaucratically inconvenient, peer review results.

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