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Please respond to Victor Holmes <victor@ce.berkeley.edu>

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

cc:

Subject: critical analysis of your proposal

Hello,

I have lightly read your proposal and, given my experiences with peer review and the peer review system, offer my criticisms below.

In general, while I feel your proposal offers reasonable solutions to on of of the possible shortcomings of peer review - namely conflicts of interest that may arise in an ever more networked scientific community, I feel it suffers from two great flaws in that 1) it adds layers of administrative requirements to a process that is already rate-limiting for the scientific community and 2) it places additional politically-minded limitations on selection of personell when current selections are already limited by availability of experts.

I feel that any regulations appended to a peer review system must NOT extend the time required for material to be reviewed and must NOT burden reviewers, who by definiton as independent researchers or experts have other work to do, with additional administrative work or requirements. While I am not familiar enough with the details of your proposal, I hope you will keep these general concerns in mind.

I feel that while well intentioned, placing limitations on who may be chosen for panels is a bad idea. First, there just aren't that many experts available for some topics: HIV? Yes, you can choose from tens of thousands. Restorations of toad habitats? you probably have a few dozen choices. While your assertion that panels for some subjects tend to be the same people over and over is true, it is probably NOT because of conflict on interest but instead because these people are the only ones readily available to essentially donate their time for the benefit of the community.

From another perspective, peer review serves as something of a democratic institution for science. Acting as a filter, review by a "random and unbiased" set of peers tends to support ideas that make sense to a majority of scientists, and repress ideas, both great and bad, that are supported by only a minority. Ideally, great ideas would have convince the reviewers on their own merits, but even without this, the process allows the scientific community to put forth a common voice. I feel this aspect of peer review is very important, and feel that some provisions in your proposal hinder it. Specifically, the insistance that "If it is necessary to select a reviewer who is or appears to be biased in order to obtain a panel with appropriate expertise, the agency shall ensure that another reviewer with a contrary bias is appointed to balance the panel" will hamstring panels that face controversial issues. For example, a panel on global warming will be hard pressed to find scientific members who do not beleive it is occurring; must an agency balance the panel with members who vehemently beleive it is not? Would that panel be representative when ~90% of the scientific community is of one mind? While this example is extreme, similar problems often trouble the reporting of science in popular media, where experts on both sides of an issue are interviewed, without explaining that a vast majority of the community supports one of the two views.

Finally, your proposal repeatedly mentions 'appearance of conflict of interest'. I understand why, for reasons of accountability and liability, this concept is important, but I feel it is not worth hindering good science for reasons of appearance. In general, I guess I mean that many of the measures you propose should be scaled back so

that, while they would still prevent blatant conflicts of interest related to profit or future position, the choice of people only vaguely related to the agencies or issues not be hindered. Remember, the top agencies will tend to support the best scientists, so you actually want some overlap there.

Thank you for considering these opinions,
Good luck in formulation of your policy, I hope it does more good than harm..

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