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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject: Comment on peer review proposal

This message is being sent on behalf of Dr. Jeffrey Drazen. Please let me know if you need any further information.

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The proposed OMB rules on peer review miss the mark because they would disqualify the most experts from providing the scientific expertise needed for decision making. The rule should be amended to allow peer reviewers who have had associations with the entity in question to provide opinion, but all reviewers should be required to disclose real and potential conflicts of interest as part of the review process.

The basis of our reasoning is that peer reviewers should not make the final decisions about an issue. Their role should be to provide expert scientific opinion to be used by the decision makers. Thus peer reviewers should be chosen based on primarily their scientific expertise; this allows the decision makers access to the best scientific thought on the subject. When the person making the decision weighs the evidence, any relationship of the reviewer to the entity requesting review should be disclosed.

For example, the best reviewers about cancer biology are the people doing cutting edge research on cancer biology. In the United States, where the Federal Government is the single largest source of funds for cancer research, it would make no sense to disqualify scientists who had received federal funds to support their research from the peer review process. At the New England Journal of Medicine, we find peer review is of value when all qualified experts in the field provide their opinion to us. When we consider each reviewer's opinion, our thinking is colored by knowledge of real or potential conflicts of interest. However, we consider peer reviewers as our consultants. Based on the totality of information available, we make, and take responsibility for, the decision that we believe is in our readers' best interest.

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