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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject: comments Peer Review and Information Quality

Hello.

re: OMB Bulliten - Peer Review and Information Quality

I am board certified in internal medicine, adjunct professor of environmental health at University of Amerherst, Massachusetts, and on the Steering Committee at Greater Boston Physicians for Social Responsibility.

I have worked as a research fellow at Harvard's Channing Laboratory and have a few minor publications.

I am deeply concerned by the following aspect of the proposal:

One provision threatens to make it impossible for federally funded researchers to be part of peer review panels - - because prior funding or the intention to seek future funding from an agency would prohibit the agency from using these scientists as independent reviewers - but not exclude industry scientists who work for regulated parties from being part of the panels.

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.

In my opinion, these provisions will likely exclude the most qualified experts, those doing the best research, but include the least reliable experts, those with clear conflicts of interest. For example, the provisions would exclude Drs Joel Schwarts and Doug Dockery (Harvard) from commenting on EPA air pollution regulations. They are two of the most informed scientists in the field of health effects of air pollution. The result will be a less proficient and more biased regulatory interpretation.

This proposal can only weaken confidence of Americans in the regulatory process and give interpretation of scientific data a bad name.

Sincerely,
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