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To: Margo Schwab <OMB_peer_review@omb.eop.gov>
Subject: Extend Public Comment Deadline for Peer Review Bulletin

James Benton
Legislative Representative/Research Analyst
Common Cause
1250 Connecticut Avenue, NW
Washington, DC 20036

May 18, 2004

Margo Schwab
NEOB Room 10201
725 17th Street, NW
Washington, DC 20503

Dear Schwab:

I am writing to urge the Office of Management and Budget (OMB) to carry out a more deliberative and proper evaluation process for the revised peer review policy. The development of the first ever government-wide set of requirements for scientific peer review should not be rushed.

OMB must immediately extend the 30-day public comment period to 90 days so interested parties, such as busy university scientists and health organizations, can fully consider the proposal's substantive changes.

I also request OMB to initiate a 120-day inter-agency review process for the revised proposal. This bulletin will significantly affect the operations of agencies and it is important to ensure that their concerns and questions are adequately addressed during this process. Given the proposal's substantial revision, it is vital that OMB re-engage the agencies in determining the impacts of the revised proposal on the regulatory process.

During the original policy proposal, OMB recognized the importance of both public comments and agencies' input by opening lengthy review periods for both. Given the significant changes to the new revised bulletin, please do not weaken public and agency involvement during this critical consideration. It is crucial that OMB gives the public and agencies an adequate opportunity to review and understand these changes.

Thank you.

Sincerely,

James C. Benton
Legislative Representative/Research Analyst
Common Cause