

## MEMORANDUM

TO: CENR and CCSP Principals  
(see Appendix, which lists these individuals)

FROM: William Brennan, Acting Director, U.S. Climate Change Science Program

RE: Clarification of review and clearance process for CCSP Synthesis and Assessment Products

Based on “lessons learned” from moving the first few CCSP synthesis and assessment products through the final review and clearance stages, this memorandum provides clarifications to the CCSP “Guidelines for Producing Synthesis and Assessment Products” (<<http://www.climate-science.gov/Library/sap/sap-guidelines.htm>>).

### ROLE OF THE PRODUCT AUTHORS

The lead and contributing authors are responsible for drafting the product. The Guidelines make a clear distinction among the respective roles of authors, expert reviewers, and stakeholders. Contributors may not serve as expert reviewers. All comments pertaining to the content of the product that arise at any stage will be referred to the lead author(s). These stages include the expert review, public comment period, as well as the final clearance stages by the lead agency, CCSP, and NSTC. Any changes that are proposed for the product’s contents will be reviewed by the lead author(s) to ensure that the scientific and technical intent is maintained. Therefore, the authors must remain available to address comments that arise throughout the process, including the final CCSP and CENR clearance stage.

It is important that the authors adhere closely to the terms of the product described in the prospectus. Consistent with the principles underpinning National Research Council studies: “The rationale for any findings, conclusions, and recommendations should be fully explained in the report. This explanation might include references to the literature, analysis of data, or a description of the pros and cons of the range of alternatives and the reasons for preferring a particular option. Failure to document conclusions and recommendations adequately is the most common shortcoming of draft reports. Recommendations calling for organizational changes, adoption of new policies or positions, or budgetary increases within government agencies should be avoided...”<sup>1</sup>

### ROLE OF THE LEAD AGENCY

#### Product Review and Clearance

The CCSP “Guidelines for Producing Synthesis and Assessment Products” indicate that following the expert review and public comment stages, the “*lead agency(ies) submit the*

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<sup>1</sup> From *Guidelines for the Review of National Research Council Reports*, 2003.

*third draft of the product and a compilation of comments received to the CCSP Interagency Committee.*” Three clarifications are made below with respect to this statement.

First, although there may be multiple contributing agencies to a given synthesis and assessment product, a single lead agency must take responsibility for ensuring compliance with the Information Quality Act (IQA), and if applicable, the Federal Advisory Committee Act (FACA).

Second, when the lead agency transmits the product for final clearance, they should include a memorandum briefly indicating that *“the product was prepared in compliance with CCSP’s Guidelines for Producing Synthesis and Assessment Products, the Information Quality Act (Section 515) and [LEAD AGENCY’S] corresponding IQA guidelines; and the Federal Advisory Committee Act [when applicable].”* This transmittal should include the authors’ responses to the peer reviewer comments, as required by OMB’s Information Quality Bulletin for Peer Review, as well as descriptions of how the authors addressed the public comments and lead agency’s review comments.

Third, to help expedite the clearance process, CCSP and NSTC clearance steps are conducted simultaneously. The lead agency will therefore simultaneously transmit the necessary materials to both. These materials include: the third draft of the product; the expert review comments and the author’s responses to them; the public comments and the author’s responses to them; and the aforementioned transmittal memorandum.

To further expedite the process, the lead agency is encouraged to submit comments it has concerning the report’s contents during the public comment stage. The lead agency should not convene an expert review in addition to the one conducted as part of the report production process.

The lead agency is responsible for informing the authors what their role is in each stage of the product development, review, public comment, and clearance process, and helping to ensure that the authors remain engaged through the final clearance process.

The lead agency will inform the authors of the steps that are required to comply with the lead agency’s Information Quality Act guidelines as well as the Information Quality Bulletin for Peer Review, and ensure that the authors follow those steps.

#### *Use of FACA (The Federal Advisory Committee Act)*

The determination of whether a FACA Committee is needed rests with the lead agency. When a FACA Committee is required, the lead agency is responsible for establishing the FACA charter and the process for appointing FACA Committee members. Note that there are other statutory requirements applicable to FACA Committees, such as those governing Federal Register announcements when a FACA Committee meets, and each lead agency is expected to comply with any relevant FACA guidelines. It is also important to note that the role of a FACA Committee is to provide advice to the lead

agency on the SAP; the SAP is not a product of the FACA Committee, nor is the SAP that is released by the Lead Agency subject to approval by a FACA Committee. However, any requests for changes to the product's contents that arise in the clearance stage will be referred back to the lead author(s). Any changes that are proposed for the product's contents will be reviewed by the lead author(s) to ensure that the scientific and technical intent is maintained.

The report is prepared by the lead agency and is ultimately a product of CCSP, a component of the federal government. Therefore, it is essential that agencies authoring SAPs who choose to invoke a FACA process carefully review the FACA Committee advice and take whatever steps are necessary to stand behind the process used to prepare the report and the conclusions therein. In other words, the lead agency must "own" the report.

### Communications

The lead agency is responsible for developing and executing a communications plan for each product. Particular attention should be given to the rollout plan, which will describe the strategy used for the release of the report to the public. It is recommended that the communication plan be developed early in the product production cycle. When applicable, it should describe the approaches for obtaining stakeholder input during the production of the product, including during the public comment period. It should also describe how and to whom the product will be communicated following its completion. The plan should allow for flexibility in planning communications-related activities given the possibility of changing timetables. The plan should be developed in consultation with the lead agency's public affairs and communications offices, and should draw from the "best practices" document maintained by CCSP's Communications Interagency Working Group. The plan should be communicated to the Executive Office of the President (EOP) and the CCSP Office.

### **ROLE OF CCSP AND NSTC**

The Global Change Research Act of 1990 requires "the Council [NSTC], through the Committee [CENR]" to deliver scientific assessment products to the President and Congress. Accordingly, the NSTC and CENR must review the assessment products prior to their release. Pursuant to the Act, the CCSP clearance process will occur via the NSTC, and will be conducted through the CENR.

Because CCSP and NSTC clearance will be conducted simultaneously, and because some agencies have members on both the CCSP Principals Interagency Committee and the CENR, those agencies should coordinate their clearances so that each agency provides only one clearance.

The CCSP/CENR clearance will rely on the lead agency's certification regarding compliance with CCSP's "Guidelines for Producing Synthesis and Assessment Products," FACA, and IQA (including the Bulletin for Peer Review). As such, an additional expert review is not expected. The focus of the CCSP/CENR clearance is to ensure that the

policy officials with legal responsibility for the documents have reviewed and approved them, with particular consideration of issues such as:

- The product does not misstate any policies or positions of the United States or any of its federal agencies. (The synthesis and assessment products are intended to be policy-relevant, not policy-prescriptive.)
- The product clearly communicates its main message to its intended audiences and includes sufficient context for members of the lay public who are interested in the science to understand the product's relevance.
- The expert review and public comments were adequately addressed by the authors.

Any requests for changes to the product's contents that arise in the clearance stage will be referred back to the lead author(s). Any changes that are proposed for the product's contents will be reviewed by the lead author(s) to ensure that the scientific and technical intent is maintained.

## **PUBLIC ACCESS TO DOCUMENTS**

The following is the minimum set of documents that are posted on the web page for each of the synthesis and assessment products

(<http://www.climate-science.gov/Library/sap/sap-summary.php>)

- invitation for public comment on draft prospectus
- draft prospectus
- public comments on draft prospectus
- final prospectus
- peer review plan (if not part of the prospectus)
- expert review comments on first draft report and authors' responses to them
- invitation for public comment on second draft report
- second draft report
- public comments on second draft report and authors' responses to them
- third draft report
- final report

Additional information is often posted for each product.

## **EXECUTIVE SUMMARY FOR THE PRODUCTS**

Each product should include an executive summary. An effective executive summary contains enough information for the reader to become acquainted with the full document without actually reading it. It should briefly summarize: the key issue(s) being addressed by the product; the background and context of the issue(s); and the major conclusions. Recognizing that the 21 synthesis and assessment products are scientific in nature, the executive summary should be written for a non-expert (e.g., to the level of an informed

high school graduate) and minimize the use of technical terminology and graphs and figures. It is recommended that the executive summary be no more than eight pages in length.

It is up to the discretion of the author teams whether or not to also produce an abstract that succinctly distills the essence and key take-home messages of the report.

Both the executive summary and the abstract (if included) are independent elements and should undergo the same review and clearance as required for the full report.

**APPENDIX**

**CENR ROSTER**

George Gray  
U.S. Environmental Protection Agency Headquarters

Conrad Lautenbacher  
National Oceanic and Atmospheric Administration

Sharon Hays  
Office of Science and Technology Policy  
Executive Office of the President

Michael Freilich  
National Aeronautics and Space Administration

Jonathan Perlin  
U.S. Department of Veterans Affairs

James Connaughton  
Council on Environmental Quality

Vacant  
U.S. Department of Energy

Robert Foster  
Office of the Secretary of Defense

Mark Myers  
U.S. Geological Survey  
Department of the Interior

Leonard Hirsch  
Smithsonian Institution

Kathryn Jackson  
River System Operations & Environment  
Tennessee Valley Authority

Gale Buchanan  
Research, Education, and Economics  
U.S. Department of Agriculture

Linda Lawson  
Safety, Energy and Environment

Department of Transportation

Kathie Olsen  
National Science Foundation

Vacant  
U.S. Department of Housing & Urban Development

David Schwartz  
U.S. Department of Health & Human Services

David Anderson  
The Office of Management and Budget  
Executive Office of the President

Bruce Davis  
U.S. Department of Homeland Security

Vacant  
U.S. Department of Labor

Claudia McMurray  
Bureau of Oceans and Int'l Environmental & Scientific Affairs  
U.S. Department of State

Samuel Williamson  
Federal Coordinator for Meteorology

EOP CC list  
Chase Hutto  
Office of the Vice President

Ted Wackler  
Office of Science and Technology Policy  
Executive Office of the President

Marty Hall  
Council on Environmental Quality  
Executive Office of the President

Other CC list  
Marta Cehelsky  
Executive Secretary  
NSTC Committee on Science and  
Senior Adviser, Office of the Director  
National Science Foundation

## CCSP roster

William Brennan, Acting Director  
National Oceanic and Atmospheric Administration  
Department of Commerce

Jack Kaye, Vice Chair  
HQ/Earth Sun System Division  
National Aeronautics and Space Administration

Allen Dearry  
National Toxicology Program  
National Institute of Environmental Health Sciences  
National Institutes of Health

Jerry Elwood  
Climate Change Research Division  
Department of Energy

Mary Glackin  
National Oceanic and Atmospheric Administration  
Department of Commerce

Patricia Gruber  
Office of Naval Research  
Department of Defense

William Hohenstein  
Global Change Program Office  
U.S. Department of Agriculture

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Safety, Energy and Environment  
Department of Transportation

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Geosciences Directorate  
National Science Foundation

Mark Myers  
U.S. Geological Survey  
Department of the Interior

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Smithsonian Environmental Research Center.



Smithsonian Institution

Jacqueline Schafer  
Bureau for Economic Growth, Agriculture, and Trade  
U.S. Agency for International Development

Joel Scheraga  
National Center for Environmental Assessment  
U.S. Environmental Protection Agency

Harlan Watson  
Department of State

Executive Office and other Liaisons to the CCSP Principals Committee

Melissa Brandt  
Office of Management and Budget  
Executive Office of the President

Stephen Eule  
Climate Change Technology Program  
U.S. Department of Energy

Katharine Gebbie  
National Institute of Standards & Technology

Margaret McCalla  
Office of the Federal Coordinator for Meteorology

George David Banks  
Council on Environmental Quality  
Executive Office of the President

Gene Whitney  
Office of Science and Technology Policy  
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Staff

Peter Schultz  
Climate Change Science Program Office

Fabien Laurier  
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