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05/27/2004 03:52:00 PM

Record Type: Record

To: OMB\_peer\_review@omb.eop.gov

cc:

Subject: CRE comments on revised OMB peer review IQA guidance/bulletin attached

Dear Dr. Schwab,

I am submitting the attached comments via fax also.

Bill Kelly



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May 27, 2004

Submitted electronically and via fax

Dr. Margo Schwab  
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RE: CRE comments on OMB's revised peer review guidance for federal agencies under the Information Quality Act (69 FR 23230-42, April 28, 2004)

Dear Dr. Schwab:

We commend OIRA for the thoughtful and careful work it has devoted to carrying out its responsibilities under the IQA in developing the subject guidance. We believe that final guidance should be issued as soon as possible. We have the following comments.

1. We strongly support the important basic requirement that peer reviewers should not have participated in the development of the work product being reviewed. (At 23240 2d col.) In the revised proposal, this guidance is stated as "should not". We believe this should be stated as "shall not".
2. We also strongly support the requirement that a detailed summary of the peer reviewers' comments shall be made available to the public. (At 23240 2d col.) We recommend that the guidance state that this summary must be made available before, or at the time of, announcement of any opportunity for subsequent public comment on the work product being reviewed.
3. In section III (for "highly influential scientific assessments"), the revised proposal states that scientists employed by an agency shall be barred from the peer review if they are employed by "the agency sponsoring the review ...." On occasion, reviews are sponsored by more than

one agency, and therefore we recommend that the guidance state that agency employees are barred as peer reviewers if they are employed by an agency sponsoring the review. (Other ways to word this would be to state that an employee is barred if (s)he is employed by the agency or agencies sponsoring the review, or by any agency sponsoring the review.)

4. It should be a basic requirement that all peer reviewers be informed of the applicable information quality and access standards. The revised proposal makes this a requirement only for peer reviews of “highly influential scientific assessments”. (At 23241 1<sup>st</sup> col.) The requirement should apply also to “influential” scientific assessments.
5. Section IX, on responsibilities of OIRA and OSTP, does not provide for any transparency with regard to the composition, individual members, or activities of the interagency consultative group, or consultations between OIRA and OSTP. We recommend that a mechanism be provided by which members of the public who would be directly affected by a peer review issue can bring that issue before OIRA, OSTP, and the interagency group, and that some degree of transparency be provided for the activities and decisions of OIRA, OSTP, and the interagency group on such issues and other issues.
6. Independence and potential bias are both key issues when federal agency employees may act as peer reviewers. We recommend that at a minimum, federal employees who have previously taken a strong public position on a key issue that will be involved in a peer review should not participate as peer reviewers. Otherwise there is likely to be a strong public perception of bias.

Thank you for considering these comments.

Sincerely,

/s/

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