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To: OMB_peer_review@omb.eop.gov

cc:

Subject: Request for agency review of Revised Peer Review Proposal

Please find attached and inserted below our request for an interagency review process for OMB's revised peer review proposal

May 12, 2004

Dr. Margo Schwab
Office of Information and Regulatory Affairs
Office of Management and Budget
NEOB Room 10201
725 17th Street, NW
Washington, DC 20503
E-mail: OMB_peer_review@omb.eop.gov
Telecopier: (202) 395-7245

Re: Revised Information Quality Bulletin for Peer Review
Request for Extension of Comment Period

Dear Dr. Schwab:

The undersigned organizations join in requesting a 120-day interagency review process on the draft Revised Bulletin on Peer Review.

Federal agencies have extensive experience with scientific information, peer review and the regulatory process. It is essential that OMB consider these agencies' opinions during the development of a government-wide peer review policy. The Office of Management and Budget (OMB) recognized the importance of agencies' feedback during the review of the original draft Peer Review Bulletin and undertook a separate comment process specifically for federal agencies. OMB encouraged agencies to provide feedback on "the expected benefits and burdens of this proposed Bulletin."

Currently, the revised proposal does not have a process to elicit feedback from these important agencies. Given the proposal's substantial revision, it is vital that OMB re-engage the agencies to determine the impacts of the revised proposal on the regulatory process. 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.

Thank you for your consideration of this request.

Sincerely,

Judith D. Auerbach, Ph.D.
Vice President, Public Policy
American Foundation for AIDS Research

Winifred De Palma
Regulatory Affairs Counsel
Public Citizen's Congress Watch

Merrill Goozner
Director, Integrity in Science
Center for Science in the Public Interest

Sean Moulton
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Paul Orum
Director
Working Group on Community Right-to-Know

Ellen Paul
Executive Director
Ornithological Council

Chellie Pingree
President and CEO
Common Cause

Jennifer Sass
Senior Scientist, Health and Environment
Natural Resources Defense Council

Bob Shavelson
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