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Record Type: Record

To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP

cc:
Subject: Peer Review and Information Quality"

To: Joshua B. Bolten, Director, Office of Management and Budget

Re: "Peer Review and Information Quality"

I feel that the proposed changes in the review process are fundamentally flawed and **strongly urge you to withdraw the proposed bulletin**.

As a research scientist in the field of animal ecology (including conservation biology), I am concerned that the proposed changes will have an **overall negative effect on the environment and public health**. I briefly summarize some of the issues involved.

-- The current review system is rigorous and adding steps to the process will not increase quality-control and will substantially increase delays.

-- There is not an unlimited pool of qualified reviewers. Moreover, peer review is essentially a voluntary service. Adding unnecessary review (in addition to that which is already in place) definitely strains the system. As an Editor of a scientific journal (*Herpetologica*), I know that finding willing, qualified referees is one of the biggest challenges in the peer review process.

-- The bulletin's definition of "conflict of interest" appears weighted against federally funded academic scientists. In contrast, scientists who work for private organizations that might be affected by the regulations do not appear to be included in the definition. In addition, **excluding federally-funded researchers as peer reviewers places an even greater strain on the over-burdened peer review system.**

-- To my knowledge, there has been no projection of specific consequences of the proposed changes. How much delay will be seen in implementation of regulations in comparison to the current system? What are the consequences (pro and con) of reorganization of some areas of administration?

-- There appears to be potential for increased costs associated with the new procedures, but there does not appear to have been a rigorous cost-benefit analysis.

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