



AMERICAN COLLEGE OF  
OCCUPATIONAL AND  
ENVIRONMENTAL MEDICINE

October 29, 2003

Dr. Margo Schwab  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
New Executive Office Building  
725 17<sup>th</sup> Street, NW, RM: 10201  
Washington, DC 20503

Dear Dr. Schwab:

The American College of Occupational and Environmental Medicine (ACOEM) is pleased to provide comments on the Office of Management and Budget's proposed guidance regarding peer review of science and technical information used in the federal regulatory process.

ACOEM represents more than 6,000 physicians who specialize in the practice of preventing, assessing, and treating occupational and environmental health problems. As the nation's leading professional organization of occupational and environmental health professionals, ACOEM has long advocated for measures which would improve worker safety and ensure that individuals are not placed in work positions which could put themselves or others at risk of harm.

We applaud OMB for undertaking this challenge. The proposed guidance will bring new illumination to the peer review process. It can only enhance the integrity and veracity of the peer review process.

We recommend that the guidance include an admonition that peer reviewers are expected to represent their professional standards, not just their own personal opinions. To find such peer reviewers, the agencies should seek the assistance of professional organizations in making and vetting nomination to peer review panels.

Thank you for your consideration of these comments.

Sincerely,

John Holland, MD, MPH  
President