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Record Type: Record

To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject: Reject the OMB Peer Review bulletin

To: Joshua B. Bolten,
Director, Office of Management and Budget,
725 17th Street, N.W.,
NEOB Room 10201,
Washington, DC
20503

Dear Sir,

I strongly believe that The Office of Management and Budget should withdraw the proposed Peer Review Bulletin and instead engage the scientific community in developing a process that is beneficial and agreed upon by the scientific and regulatory communities. I believe that The National Academy of Sciences is an appropriate forum for such a discussion. The Academy has issued several important reports on agency peer review, as well as on broader issues relating to the role of science in regulation.

It is my opinion that the the proposal will not permit unbiased reviews. In particular, the proposal's conflict of interest requirements appear to be written in a way that will preclude the participation of academic scientists whose work is supported by federal funding, but not exclude industry scientists who work for regulated parties. The proposal appears to exempt a large proportion of regulatory documents where the science emanates from the regulated industry, where many would argue the science is in most need of peer review.

As written, the proposal appears to exempt a large proportion of regulatory documents where the science emanates from the regulated industry, where many would argue the science is in most need of peer review. For example, the proposal exempts foreign affairs and national defense from peer review, although scientific peer review in this realm would be valuable in many instances. The exclusion of these areas from the peer review proposal suggests that the objective of the proposal is not to improve regulatory science but rather to promote defense spending while hampering environmental and public health protection.

I appreciate you considering my opinion in this matter.

Sincerely,
Sheryl Soucy-Lubell

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