

bbrain1@earthlink.net
12/15/2003 04:35:07 PM

Please respond to bbrain1@earthlink.net

Record Type: Record

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

cc:

Subject: Peer Review and Information Quality comments

To whom it may concern,

I am writing to express my opinion regard the proposed Peer Review and Information Quality proposal currently under review by OMB. As a scientist with over seven years of experience within the field, I feel that changes proposed in this document are unwarranted and unsound.

First, I feel that there is no evidence that the current system is not working. Second, I feel that it will be difficult to obtain independent, knowledgeable peer-reviewers to review the large numbers of documents, many of which will contain no new science. I am also very uneasy with the proposal's conflict of interest requirements, which 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. Additionally, I am alarmed that the proposal also exempts foreign affairs and national defense from peer review, although scientific peer review in this realm would be valuable in many instances. Finally, I feel that centralizing the authority for regulatory scientific peer review in the Office of Management and Budget, an office with few scientists, will likely hurt the process of scientific review while increasing the amount of bureau! cracy.

In conclusion, I would like to recommend that Office of Management and Budget withdraw the proposed Bulletin and engage the scientific community in a discussion of the need and structure of peer review in regulatory science.

Thank you.

Kristen Manies