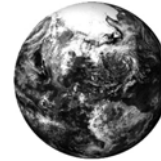


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TO: CCSP Synthesis and Assessment (S&A) Product Leads

FROM: James R. Mahoney, CCSP Director
Richard H. Moss, CCSPO Director

RE: Implications of the OMB Peer Review Bulletin
for preparation of CCSP S&A Products

DATE: 19 May 2005

CC: CCSP Principals
CCSP Interagency Working Group Co-Chairs
IQA Leads

The CCSP Synthesis and Assessment (S&A) Products are being prepared by teams of agencies according to procedures outlined in the Guidelines for Producing CCSP S&A Products (“CCSP Guidelines”) released on 2 December 2004. This memo summarizes the implications of the Office of Management and Budget’s Final Information Quality Bulletin for Peer Review (“OMB Bulletin”) (issued 16 December 2004) for preparation of CCSP S&A Products.

Background

The Information Quality Act (PL 106-554, §515 (a)) (“IQA”) directed OMB to issue guidelines “for ensuring and maximizing the quality, objectivity, utility, and integrity of information” disseminated by Federal agencies. Under this directive, OMB issued a Bulletin that establishes government-wide guidance and minimum standards for peer review of influential scientific information disseminated by the Federal government. The OMB Bulletin requires a more rigorous form of peer review for a subcategory of information referred to as “highly influential scientific assessments.” CCSP S&A Products have all been determined to be highly influential scientific assessments. Responsibility for implementing the OMB Bulletin lies with Federal agencies. The OMB Bulletin provides policy and procedural guidance that is intended to improve the internal management of the Executive Branch. CCSP S&A Product leads should review the OMB Peer Review Bulletin; especially sections II-V (see pp. 2675-2676 of the 15 January 2005 Federal Register at <http://www.whitehouse.gov/omb/fedreg/2005/011405_peer.pdf>).

Role of an IQA Lead Agency for the CCSP S&A Products

The CCSP guidelines anticipate interagency collaboration in preparing the S&A Products to ensure that the best available scientific information from all relevant agencies is incorporated. However, ensuring compliance of a particular S&A Product with the OMB Bulletin is the responsibility of a single agency. For internal CCSP purposes, we refer to this agency as the “IQA Lead Agency.” In addition to ensuring that the S&A Product meets the lead agency’s Information Quality Guidelines, the IQA Lead Agency is responsible for complying with the requirements of the OMB Bulletin, including (i) developing the peer review plan, (ii) preparing the peer review report, and (iii) composing the response to the peer review as discussed later in this memo. Other agencies working in collaboration with the IQA Lead Agency on individual S&A Products are not required to carry out simultaneous peer reviews.

Currently, S&A Products 2.2, 2.3, 2.4, 4.1, 4.3, and 4.4 list multiple Lead Agencies. CCSP will designate a single IQA Lead Agency in each case. The CCSP Office will communicate with the points of contact for these products to clarify which agency will serve as the IQA Lead Agency.

The IQA Lead Agency will be responsible for informing CCSP that the requirements of the OMB Bulletin have been met. This will be a key factor in CCSP’s determination that the product is ready for review by the Committee on Environment and Natural Resources (CENR). CCSP Product leads from the IQA Lead Agency should work with their agency’s IQA point(s)-of-contact (listed in Attachment A), who will provide specific advice and information for meeting the requirements of the OMB Bulletin.

Defining the Peer Review Process

Both the OMB Bulletin and the CCSP Guidelines give agencies wide latitude in selecting peer review processes for the CCSP products. Selection of an appropriate peer review mechanism will be the responsibility of the IQA Lead Agency, but CCSP encourages that participating agencies be consulted.

Choice of Peer Review Mechanism

The OMB Bulletin provides three basic approaches for satisfying the peer review requirement: (i) an independent, external review that follows the requirements of Section 3 of the OMB Bulletin; (ii) a review by a National Academy of Sciences (NAS) panel or reliance on the findings and recommendations of a National Academy of Sciences report; or (iii) an "alternative procedure" specifically approved by OMB’s Office of Information and Regulatory Affairs (OIRA) Administrator in consultation with the Office of Science and Technology Policy (OSTP).¹

Any of these methods may include requests for the public (including scientific and professional societies) to nominate potential reviewers. If public recommendations of reviewers are sought, information about how and when to nominate reviewers must be included in the product prospectus

¹ Refer to Section IV of <http://www.whitehouse.gov/omb/fedreg/2005/011405_peer.pdf> (page 2671) for detail. Further page references are to this document unless otherwise noted.

(CCSP Guidelines, Section 6 – Reviews and product timeline). Refer to Attachment B for recommended language.

Both the OMB Bulletin and the CCSP Guidelines allow an IQA Lead Agency to commission an independent entity to manage the peer review process, including the selection of peer reviewers.

Documents provided to peer reviewers must be identified as pre-dissemination information. The following statement should be placed in the footer of each page:

“This information is distributed solely for the purpose of pre-dissemination peer review under applicable information quality guidelines. It has not been formally disseminated by [IQA LEAD AGENCY HERE]. It does not represent and should not be construed to represent any agency determination or policy.”

Selection of Reviewers

The OMB Bulletin lays out guidelines for the selection of reviewers, with the primary emphasis on reviewer expertise. Expertise is based upon experience, published work, and stature within and across the scientific community(ies). Other criteria include balance (specifically scientific balance), independence, rotation (to avoid overuse of the same reviewers), and conflict of interest. The IQA Lead Agency must ensure compliance with the conflict of interest and independence requirements of the OMB Bulletin. Peer reviewers who are federal employees are subject to federal requirements governing conflicts of interest. See, e.g., 18 U.S.C. § 208; 5 C.F.R. Part 2635 (2004). With respect to reviewers who are not federal employees, agencies shall adapt the NAS policy for committee selection with respect to evaluating conflicts of interest. A form embodying this policy is available at <<http://www.usgcrp.gov/sap/iqa/disclosure.htm>>.

Scientists employed by the IQA Lead Agency are not permitted to serve as reviewers. There is an exception to this ban that may be available in rare situations as described in Section III.3.c of the OMB Bulletin.

Charge to Reviewers

The OMB Bulletin (pp. 2668-2669) anticipates a written charge will be provided to reviewers to focus their effort. The charge should contain instructions regarding the objective of the review and the specific advice sought. For a sample charge statement, see Attachment C or <<http://www.usgcrp.gov/sap/iqa/peercharge.htm>>.

The charge should be developed before reviewers are selected. CCSP recommends that it be included in the prospectus (it *must* be included if the prospectus is going to be used to solicit reviewers). The charge should be developed in consultation with the IQA Lead Agency’s IQA point(s)-of-contact (Attachment A).

Peer Review Planning

The OMB Bulletin requires a systematic process of peer review planning, including a web accessible “Agenda” of Peer Review Plans. The IQA Lead Agency is responsible for ensuring that the peer review plans for the S&A Products for which it is the lead are posted on their Agenda. Note that the

effective date for the Agenda as it pertains to highly influential scientific assessments is June 16, 2005.

The specific items for inclusion in the Peer Review Plan are stated in the OMB Bulletin (p. 2676); they include a preliminary title of the planned report, a short paragraph describing the subject and purpose of planned report, and an agency contact person. Peer Review Plans should be developed in collaboration with IQA point(s)-of-contact. Virtually all information required by the OMB Bulletin falls within the scope of the CCSP product prospectus, so IQA peer review planning documentation primarily involves repackaging of existing materials.

The IQA Lead Agency should inform the CCSP Office of the URLs for entries in their Agenda for CCSP S&A Products so that the CCSP webpage can be linked to them.

Peer Review Reporting

Section III.6 of the OMB Bulletin provides the requirements for a peer review report. The peer review report should either summarize the views of the reviewers as a whole or include a verbatim copy of the comments of the individual reviewers. The requirements for the peer review report include: (i) identification of the members of the peer review panel; (ii) the peer reviewers credentials; and (iii) the charge to the reviewers. The CCSP Guidelines call for making the peer review comments publicly available, but do not require attribution of comments to the individual peer reviewers. In disclosing information about peer reviewers, the agency shall comply with the requirements of the Privacy Act, 5 U.S.C. § 552a, as amended.

For highly influential scientific assessments, the OMB Bulletin requires a written response to the peer review, indicating: (i) whether the Agency agrees with the reviewers; (ii) the actions the Agency has taken or plans to take to address the points made by reviewers; and (iii) the reasons why the actions satisfy key concerns (if any) in the report. One option for complying with this requirement is to prepare an annotated response to a collation of un-attributed reviewer comments, along with a new draft of the Product.

The IQA Lead Agency is required to disseminate the peer review report(s), including the Agency's response to the review(s) on the Agency's website. The CCSP website will also provide a link to these materials. The IQA Lead Agency will need to provide a copy of these materials to the CCSP Office. The peer review and agency response should be made available to the public with enough time for the public to consider their implications during the public comment period on the draft S&A Product.

Public Comments

Peer review should not be confused with public comments or other stakeholder contributions. The CCSP Guidelines require that public comments submitted during the public comment period will be collated with attribution. The report will be revised again in response to the public comments, if warranted. The public comments will be released to the public on the CCSP website. Note that while the IQA Lead Agency is required to disseminate its response to the peer review via the Web, there is not a similar requirement for response to public comments.

Role of CCSP

Each IQA Lead Agency must satisfy the requirements of the IQA as guided by the OMB Bulletin. The CCSP Office will provide secretariat support as part of the Expert Review and Public Comment Period process.

The CCSP web site will serve as a single point of reference for all materials relevant to each S&A product. Product-specific web pages on the CCSP web site will contain a hyperlink to each IQA Lead Agency and their individual Agenda of Peer Review Plans and Agency-specific materials related to the peer review (i.e. any charge statement, the final peer review report(s), and the Agency response). Please provide the exact URLs for material on your Agency's website related to each S&A Product for which you serve as IQA Lead Agency.

Attachments:

A. Agency IQA Contact Information

Agency	Name	Phone	Email
DOC/NOAA	Dan Cohen	202-482-4144	dcohen1@doc.gov
DOE	Dwayne London	202-586-6975	Dwayne.London@hq.doe.gov
	Samuel Bradley	202-586-6738	Samuel.bradley@hq.doe.gov
DOI/USGS	Ronald Kirby	206-220-4640	Ronald_Kirby@usgs.gov
USDA	Stuart Shelton	202-720-5566	Stuart.SHELTON@usda.gov
EPA	Manisha D. Patel	202-564-1042	Patel.Manisha@epa.gov
	Evangeline Cummings	202-564-1728	Cummings.Evangeline@epamail.epa.gov
NASA	Annette Moore	202-358-1255	Annette.moore-1@nasa.gov
	Martha Maiden	202_358-1078	Martha.e.maiden@nasa.gov
DOT	Steven Lott	202-366-1314	Steven.Lott@ost.dot.gov
	Robert Ashby	202-366-9310	Robert.Ashby@dot.gov

B. Prospectus Section 6 Review Recommended Language

“The public is invited to nominate Expert Reviewers to participate in the peer review of the draft S&A Product [PRODUCT # HERE]. Nominations should be sent to [IQA LEAD AGENCY CONTACT INFORMATION HERE] by the reviewer nomination deadline [DATE] and must include CVs and publications listings. The IQA Lead Agency will ensure that selected reviewers are technically qualified (as demonstrated by scientific experience and published work). The IQA Lead Agency will screen for real or perceived conflict of interest and independence from the IQA Lead Agency and contributing agencies. The IQA Lead Agency will ensure that the slate of reviewers reflects a balance of scientific/technical perspectives.”

Attachment C: Example of a Peer Review Charge

Reviewers may be asked to use the following questions in formulating their comments.

1. Is the charge clearly described in the report? Are all aspects of the charge fully addressed? Do the authors go beyond their charge or their expertise?
2. Are the conclusions and recommendations adequately supported by evidence, analysis, and argument? Are uncertainties or incompleteness in the evidence explicitly recognized? If any recommendations are based on value judgments or the collective opinions of the authors, is this acknowledged and are scientifically defensible reasons given for reaching those judgments?
3. Are the data and analyses handled competently? Are statistical methods applied appropriately?
4. Are the report's exposition and organization effective? Is the title appropriate?
5. Is the report fair? Is its tone impartial and devoid of special pleading?
6. Does the executive summary concisely and accurately describe the key findings and recommendations? Is it consistent with other sections of the report?
7. Are signed papers or appendices, if any, relevant to the charge? If the report relies on signed papers to support consensus findings or recommendations, do the papers meet criterion 3 above?
8. What other significant improvements, if any, might be made in the report?