

Lucio Chiaraviglio <louiselucio@ezsg.com>

12/11/2003 09:28:10 PM

Please respond to louiselucio@ezsg.com

Record Type: Record

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

cc:

Subject: OMB proposed Bulletin

The Office of Management and Budget should withdraw the proposed Bulletin and engage the scientific community in an open, transparent process.

There is no evidence that the current system is not working. Many speakers pointed out that not a single example has been raised demonstrating inappropriate or flawed federal regulations being promulgated as a result of failure to peer review.

There currently exist many models of scientific peer review in government agencies. The authors of the OMB proposal made no attempt to examine this extensive experience and see what works well (and what doesn't), and on that basis determine if changes are needed.

The OMB Bulletin is unclear and confusing on many points. It is likely, however, that implementation of the proposal will lead to delay, increased and unfounded costs, and confusion. Although the OMB touts the need for cost benefit analyses in government regulations, there has in this instance been no assessment of the costs of the proposed Bulletin in terms either of diversion of agency resources or delayed regulatory protection.

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.

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. There is no need for a blanket exemption for national defense issues, as a case-by-case national security exemption policy could handle any security sensitive issues. 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 hamper environmental and public health protection.

Dr. Lucio Chiaraviglio
Professor Emeritus, Information and Computer Science
Georgia Institute of Technology