

OMB Peer Review Guidelines

NOAA Fisheries

Economics & Social Science Workshop

April 19, 2006



Background

- **Information Quality Act (IQA)**
 - Ensure and maximize quality, objectivity, utility, and integrity of information disseminated by NOAA
 - Administrative mechanism allowing affected persons to seek and obtain correction of information that does not comply with OMB and NOAA Guidelines
 - Report to OMB number and nature of requests received and how they were handled by NOAA



Basics of OMB's Peer Review Bulletin (PRB)

- Issued under the IQA and OMB's general authorities to oversee the quality of agency information, analyses and regulatory activities
- Applies to "Influential Scientific Information" disseminated by Agencies
- Establishes:
 - Minimum peer review standards
 - Transparent process for public disclosure
 - Opportunity for public input



What's Covered

- **Influential scientific information**
 - Scientific information that the agency reasonably can determine will have or does have a clear and substantial impact on important public policies or private sector decisions
- **Scientific assessment**
 - An evaluation of a body of scientific or technical knowledge that typically synthesizes multiple factual inputs, data, models, assumptions, and/or applies best professional judgment to bridge uncertainties in the available information
- **Highly influential scientific assessments**
 - (i) Could have a potential impact of more than \$500 million in any year, or
 - (ii) Is novel, controversial, or precedent-setting or has significant interagency interest



What's Not – IQA Exclusions

- **Exclusions of OMB's Info Quality guidelines incorporated into PRB; examples include:**
 - Distribution limited to government employees or agency contractors or grantees
 - Intra- or inter-agency use or sharing of government information
 - Responses to requests for agency records under FOIA, the Privacy Act, the Federal Advisory Committee Act, etc.
 - Correspondence with individuals or persons, press releases, archival records, public filings, subpoenas and adjudicative processes.
 - Research produced by government-funded scientists if that information does not represent the views of the agency (must include a specific disclaimer)



What's Not – PRB Exemptions

- **Exemptions specific to the PRB**
 - Information related to national security or foreign affairs
 - Regulatory impact analysis or regulatory flexibility analysis under EO 12866
 - Routine statistical information
 - Information distributed for peer review in compliance with the Bulletin (must include an OMB-required disclaimer)
 - Information disseminated in an individual agency adjudication or permit proceeding



Peer Review Standards: Two Levels

- **Standards for influential scientific information**
- **Standards for highly influential scientific assessments include those above, plus several others**



Peer Review Standards: Influential Scientific Information

- **Selection of reviewers**
 - Expertise and balance
 - Conflicts of interest
 - Independence
- **Choice of peer review mechanism**
- **Transparency**
- **Management of peer review process and reviewer selection**



Peer Review Standards: Highly Influential Scientific Assessments

- All standards for influential scientific information, plus
- Selection of reviewers
 - Expertise and balance
 - Conflicts
 - Independence
 - Rotation
- Information access
- Opportunity for public participation
- Transparency



Peer Review Standards: Alternative Procedures

- **Agency may:**
 - **rely on the principal findings, conclusions and recommendations of a report produced by the National Academy of Sciences;**
 - **commission the National Academy of Sciences to peer review an agency's draft scientific information; or**
 - **employ an alternative scientific procedure or process, specifically approved by the Administrator of OIRA in consultation with the Office of Science and Technology Policy (OSTP), that ensures the agency's scientific information satisfies applicable information quality standards**



NOAA Requirements

- Peer Review Agenda
- Peer Review Plans
- Public Comment
- Annual Reports
- Certification in the Administrative Record
- Populate DOC web site



Examples of ISI and HISA

- **ISI:**
 - Critical Habitat designation for SRKW, economic analysis
 - Post hurricane survey of Charterboat owners (survey results disseminated by NACO, not NMFS)
 - Protected species valuations
- **HISA:**
 - Proposed noise exposure criteria for marine mammals
 - Climate Change Science Program synthesis and assessment reports



Existing Peer Review Processes

- **Center for Independent Experts (CIE)**
 - Satisfies PRB requirements for ISI and HISA
 - NMFS must still comply w/PRB's transparency requirements
- **SAW/SARC, SEDAR, STAR**
 - For ISI only
 - Transparency requ'ts still apply
- **Fishery Management Councils**
 - Science and Statistical Comms (SSC)
 - For ISI only
 - Transparency requ'ts



Recent OMB Initiatives

- **Guidance on Agency Survey and Statistical Information Collections**
 - Numerous references to information quality generally and specific requirements in OMB IQ Guidelines and PRB
 - Be mindful of IQA and PRB requirements when preparing information collection requests
- **Proposed Risk Assessment Bulletin**
 - Out for comment until June 15th
 - Borrows concepts from IQA and PRB, e.g. heightened requirements for “influential” risk assessments
 - Risk assessment broadly defined
 - Limited applicability w/in NMFS??



Bottom Line – What you really need to know:

- **IQA and PRB – triggered by dissemination of (influential scientific) information**
- **IQA- Pre-dissemination review of information disseminated to the public**
- **PRB – watch for “influential scientific information” – clear and substantial impact on important public policies or private sector decisions**
- **PRB data calls every 6 mos. to update agency’s peer review agenda**
- **Contact your IQA Point of Contact and/or GCF if uncertain on IQA or PRB applicability**



Useful URLs

- OMB Peer Review Bulletin:
<http://www.whitehouse.gov/omb/memoranda/fy2005/m05-03.pdf>
- DOC Information Quality Site:
http://www.osec.doc.gov/cio/oipr/info_qual.html
- NOAA Information Quality Guidelines:
<http://www.noaanews.noaa.gov/stories/iq.htm>
- NMFS IQA site:
<http://apps.nwfsc.noaa.gov>
- NMFS IQA Coordinator:
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