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To: Mabel E. Echols OMB\_Peer\_Review/OMB/EOP@EOP

cc:

Subject: Letter from Former Regulators: Revised

Dear Dr. Schwab,  
Attached you will find a letter signed by a group of former federal regulators, commenting on OMB's proposed "peer review and information quality guidelines." A version of this letter was previously submitted to your office (dated 12/16/2003). The attached version includes an additional signature; I respectfully request that you replace the earlier version with this new letter dated 1/9/2004.

FYI: A copy of this letter has been faxed to OMB Director Joshua Bolten.

January 9, 2004

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

Re: Proposed Bulletin on Peer Review and Information Quality

Dear Mr. Bolten:

As former regulators, we are writing to express concern about the recently published "Proposed Bulletin on Peer Review and Information Quality," which, in its current form, could damage the federal system for protecting public health and the environment. We call on the Office of Management and Budget (OMB) to withdraw the proposal and engage in a thorough, open discussion about the role of peer review in the regulatory context with the scientific, public health, environmental and consumer communities.

On November 18, 2003, the Science, Technology, and Law Panel of the National Academy of Sciences held a workshop on the Office of Management and Budget's proposal entitled "Peer Review and Information Quality." The NAS invited a diverse group of scientists to comment on the proposal. Speaker after speaker warned that implementation of this proposal would lead to increased costs and delays in disseminating information to the public and in promulgating health, safety, environmental and other regulations, while potentially damaging the existing system of peer review. Many of the speakers noted that OMB had failed to identify a single report or piece of regulation that would have been improved had the proposed peer review system been in place.

Peer review is an important process. It's too important to be addressed in a poorly conceived proposal.

The National Academies have examined this issue for the federal government in the past. In order to preserve the functioning of the systems through which the federal government protects the public's health and environment, we strongly urge you to withdraw the proposed Bulletin and, instead, enlist the

assistance of the National Academies in considering the appropriate systems of peer review of new scientific information.

Sincerely,

Carol M Browner, JD  
EPA Administrator  
(1993-2001)

Robert B Reich, MA, JD  
Secretary of Labor  
(1993-1997)

Russell Train, JD  
EPA Administrator  
(1973-1977)

Eula Bingham, PhD  
Former Assistant Secretary for  
Occupational Safety and Health  
US Department of Labor

Joan Claybrook  
Former Administrator  
Nat. Highway Traffic Safety Administration

John DeVillars, MPA  
Former New England Administrator  
US Environmental Protection Agency

Carol Tucker Foreman  
Former Assistant Secretary for  
Food and Consumer Services  
US Department of Agriculture

J. Charles Fox  
Former Assistant Administrator for Water  
US Environmental Protection Agency

Lynn R. Goldman, MD, MPH  
Former Assistant Administrator  
for Toxic Substances  
US Environmental Protection Agency

Victor J. Kimm, MCE  
Former Acting Assistant Administrator  
for Toxic Substances  
US Environmental Protection Agency

Neal Lane, PhD  
Former Assistant to the President for  
Science and Technology, and  
Director of the White House Office of  
Science and Technology Policy

J. Davitt McAteer, JD  
Former Assistant Secretary for  
Mine Safety and Health  
US Department of Labor

David Michaels, PhD, MPH  
Former Assistant Secretary  
for Environment, Safety and Health  
US Department of Energy

Mary D. Nichols, JD  
Former Assistant Administrator  
for Air & Radiation  
US Environmental Protection Agency

Mike Pertschuk, JD  
Former Chairman  
Federal Trade Commission

Anthony Robbins, MD, MPA  
Former Director  
National Institute for Occupational  
Safety and Health  
US Dept of Health, Education & Welfare

Linda Rosenstock, MD, MPH  
Former Director  
National Institute for Occupational Safety  
and Health  
US Dept of Health & Human Services

Gerard Scannell  
Former Assistant Secretary for  
Occupational Safety and Health  
US Department of Labor

Bruce C. Vladeck, PhD  
Former Administrator  
Health Care Financing Administration

Wesley P. Warren  
Former Associate Director for Natural  
Resources, Energy & Science  
Office of Management and Budget

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