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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject: Proposed Bulletin on Peer Review and Information Quality

Dear Sirs;

Having reviewed the Proposed OMB Peer Review and Information Quality Bulletin and Supplementary Information, it is my strong belief that such a policy will be overly burdensome both on the regulatory agencies, and also on the scientific community that will be called upon to perform the peer reviews.

My recommendations are:

- 1) Require external and independent peer review of regulations only when such regulations are seriously and responsibly challenged (as judged, perhaps, by OMB) during the formulation of the regulations (e.g., during the public comment stage). This will avoid a blanket requirement to peer-review every regulation.
- 2) Utilize the National Research Council to organize and perform the mandated peer-reviews. The NRC, as the study, review, and evaluation arm of the National Academies of Science, Engineering and the Institute of Medicine, was established precisely to perform the type of independent, external peer reviews currently proposed by OMB. Both the appearance and the reality of independence of peer review can be established and maintained by the mandated use of the National Research Council for regulatory peer reviews.

Cordially,
-erik

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