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

cc:

Subject: comments on peer review

Dr. Margo Schwab
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
New Executive Office Building
Room 10201
Washington, D.D 20503

12 December, 2003

Dear Dr. Schwab,

I appreciate the sentiments expressed in OMB's proposed peer review guidelines. The peer review process is not perfect, but it's the best quality control we have in scientific research. However, I don't think rigorous peer review is required for much regulatory work, and I sincerely doubt that OMB is the best organization to oversee and define the peer review.

Requiring peer review for such a wide range of agency actions does not seem realistically feasible. Where are all of these experts going to come from, and who is going to pay for all of their time? Currently, as a researcher at the University of Alaska Fairbanks, I am occasionally asked to review studies or results. In only one instance was there any offer to pay me for my time. I can honor most of these requests, but some I have to turn down. My supervisor, who is a professor, is asked to do many more reviews, and can only take on a fraction. Where is all the time and money going to come from to carry out these additional reviews?

In addition to the question of feasibility, there was one part of the "Selection of Peer Reviewers" section that particularly bothered me: the final sentence, requiring choosing a reviewer with a contrary bias to "balance" the panel. If the scientific consensus on an issue leans a certain direction, then the panel may be seen as "biased". In an effort to "balance the bias", we end up giving equal time to fringe opinions. This has occurred in many scientific debates, where the media tries to present "both sides" of an issue. The result is a skewing of the public perception, obscuring of the science, and delaying progress on the issue. Scientists end up continually de-bunking myths rather than researching new questions.

I encourage you to withdraw the proposed Bulletin, and engage the National Academy of Sciences to determine the best way to improve the peer review process for government agencies. I have been very impressed with the quality of work that has been done through the NAS (more non-paid review work!). They would do a good job in coming up with recommendations that would address the issues of information quality.

Sincerely,

Martha Raynolds
Research Associate
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