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To: OMB\_peer\_review@omb.eop.gov  
cc:  
Subject: Comments on revised peer review guidance

Dear Dr. Schwab,

Comments on the revised peer review guidance are attached.

Ellen Paul

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"Providing Scientific Information about Birds"



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- OMB-peer-review-REV.doc

24 May 2004

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, DC 20503

*By e-mail*

Dear Dr. Schwab,

The Ornithological Council appreciates the opportunity to submit comments on the revised Proposed Bulletin on Peer Review and Information Quality. A consortium of scientific ornithological societies with a cumulative membership of approximately 6,500 scientists, the Ornithological Council addresses government policies that affect the manner in which scientific research is conducted or that have an impact on the way that scientific information is used in decision-making.

The proposed revisions are a considerable improvement over the initial draft. Our concerns about possible, if not probable bias that would result from the manner in which panelists were to be selected have been largely addressed. We appreciate the fact that OMB took seriously the concerns of the scientific community in this regard.

We have several suggestions and comments pertinent to the final version of the guidance:

- We support the requirement that agencies post their peer-review agendas on their websites.
- OMB's response to the effect that the Bulletin does not cover "information products released by government-funded scientists (for example, those funded intramurally or extramurally by agencies such as but not limited to NIH or NSF...if those information products are not represented as the views of the agency or department supporting the research...)" should be reiterated in entirety in the actual guidance, to give this clarifying statement equal prominence and weight. It should not be relegated to an informal companion document. The response document avers that this is made clear in the revised proposal, but in fact, the language in the proposal is not as clear as that in the response summary. We urge OMB to transpose the fuller explanation from the response summary to the final guidance, for increased clarity and certainty.
- With regard to the disclosure of the identity of peer reviewers, we recognize that transparency is a laudable goal and that there is a difference between peer review of scientific information for the purposes of regulatory decision-making or dissemination of information by government agencies and the peer review typically used for the private publishing of scientific information. As citizens who will be affected by or who are concerned with agency regulations, we realize that the only real way to assess the balance or bias of a panel is to know who served on the panel.

As scientists, however, we recognize that there is also value in anonymous peer review, so as to encourage the reviewers to give candid assessments. We recognize that the National Academies of Science has succeeded in securing the participation of highly-regarded experts who have apparently voiced candid assessments of the body of scientific information before a given panel. However, agencies may find it difficult to regularly attract panelists with sufficient qualifications if those scientists are not assured anonymity. On balance, we feel that it is more important to have highly-qualified reviewers than to have the identities of those reviewers known to the public. While OMB's revised Guidance gives agencies the option to consider disclosure both of the identity of the reviewers and the reviewers' comments, we think the Guidance should stress the importance of qualification and candor over transparency.

In closing, we again wish to express our appreciation for OMB's responsiveness to the concerns raised by the scientific community and hope that these comments on the revised guidance prove useful.

Sincerely,

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