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

cc:

Subject: Comment on OMB Peer Review Bulletin

Please note: The full text of this comment appears in the attached PDF file, as well as in the text below.

- OMBComent.PDF

December 15, 2003

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

Dear Sir:

While I applaud the concept of increased scrutiny of scientific claims that the OMB Bulletin entitled "Peer Review and Information Quality" strives for, I harbor grave concerns about the methods it establishes to accomplish this objective. Scientific information is all too often misused in the political arena, including by "scientists" who set out with an agenda, seeking and seeing only information that supports it. Such individuals exist in all sectors of science, however, and the current Bulletin seems to assume the problem is rife in academia but absent in corporate laboratories. Having worked in both arenas, I must sadly attest that this is definitely not the case. The Bulletin's present guidelines seem to rule out as peer reviewers the very scientists most likely to be objective, those who's work is funded by the government, leaving to those involved in advocacy for organizations and corporations the task of providing objective reviews. The guidelines are also so cumbersome as to inhibit the ready flow of information that is so essential to the scientific process. I would urge you to look at existing review structures, including the OMB's own self-regulatory auditing systems, for more streamlined approaches to the root problem you seek to address. I would also urge you to avoid moving so much control over scientific matters into the OMB's circle of responsibility, unless you intend to significantly expand the scientific expertise of your staff. Scientists may giggle with glee at the concept of budget oversight being transferred to the NAS, but it seems ill-advised. Yet the current proposal strikes me as an effort at the reverse, an effort to place oversight of scientific thought in the hands of financial experts. As a fellow citizen and a scientist, I urge you to consider carefully the wisdom of the policy advocated by the current Bulletin, and revise it to make it less cumbersome, more transparent, and thereby more effective at accomplishing its laudable ultimate goal.

Respectfully yours,

Dr. Robert C. Rossi

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