

Celeste Monforton <eohcnm@gwumc.edu>
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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject: Revised comments

Dr. Schwab,
Please replace the comments that were submitted yesterday by a group of former regulators with this version. (A few typo's have been corrected.) The new text appears below, and a PDF version of the letter is attached. If you or someone on your staff has any questions, please do not hesitate to contact me.

Celeste Monforton
Senior Research Associate
George Washington University
202-994-0774

- LettertoBoltenSignatures.pdf

December 15, 2003

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

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,

Eula Bingham, PhD

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

Joan Claybrook

Former Administrator
National 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

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