

THE NATIONAL ACADEMIES

Advisers to the Nation on Science, Engineering, and Medicine

National Academy of Sciences
National Academy of Engineering
Institute of Medicine
National Research Council

August 9, 2001

Ms. Brooke Dickson
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, D.C. 20503

Dear Ms. Dickson:

These comments are being submitted on behalf of the National Academy of Sciences in response to the notice that appeared in the Federal Register for June 28, 2001, pages 34489-34493.

As explained in the Federal Register notice, Pub. L. 106-554, Section 515 directs the Office of Management and Budget (OMB) to issue government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies. Within one year after OMB issues these guidelines, agencies must issue their own implementing guidelines that include administrative mechanisms allowing affected persons to seek and obtain correction of information maintained and disseminated by the agency that does not comply with the OMB guidelines."

The National Academies applauds the government's efforts to ensure that information disseminated by Federal agencies meets a basic level of quality, objectivity, utility, and integrity. However, The National Academies has significant concerns with the following statement in the proposed guidelines,

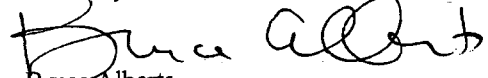
"With respect to scientific research information, the results must be substantially reproducible upon independent analysis of the underlying data."

This statement establishes a new and unreasonable standard for the dissemination of scientific information by the government. Agencies frequently rely on peer reviewed, published information. This proposed requirement would severely restrict agency use of the best and most current scientific information available.

The peer review process and the criteria for scientific publication, which represent "quality, objectivity, utility, and integrity" of information for the scientific community, do not include demonstration *a priori* of independent reproduction of the underlying data. Requiring the results to be "substantially reproducible upon independent analysis of the underlying data" establishes a standard that is not the norm for the scientific community. The peer review process typically evaluates the methods and procedures—the soundness of the approach and results—it does not include independent reproduction of the research results. As I noted previously (Alberts letter to Charney, April 5, 1999), "publication of research results in peer reviewed scientific journals is one of the most critical elements of the research process. It is the means by which new discoveries are communicated to others in the scientific community and to the public at large." One of the objectives of publishing results is to expose the research findings to a larger scientific audience to critique and build upon, which does frequently result in other researchers attempting to reproduce and check research results.

We strongly encourage OMB to seek an extension to the September 30 deadline, so that the issues raised above can be more thoroughly vetted and discussed. The National Academies welcomes the opportunity to participate in further discussion of these issues.

Sincerely,



Bruce Alberts

President

National Academy of Sciences