



THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL

Office of the Executive Vice Chancellor
and Provost

August 8, 2001

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

Dear Ms Dickson:

I am writing to comment on the "Proposed Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies" which was published in the Federal Register on July 28, 2001. In making my comments, I speak from my position as Executive Vice Chancellor and Provost of The University of North Carolina at Chapel Hill and on behalf of members of the scientific community on our campus.

Although there are a number of concerns about the proposed new guidelines, I want to comment specifically on the consequences of these regulations to research being performed by university faculty with federal support. As we understand the intent of these guidelines, it would not be appropriate to include faculty research supported by federal grants within the scope of these regulations. Nevertheless, the proposed guidelines do not provide reassurance that faculty research would be excluded from the June 28 notice. If faculty research were not excluded, the new guidelines could severely limit researchers right to publish as defined by long-standing academic practices and seriously disrupt the scientific progress in many areas of primary importance to the public.

Other areas of the proposed guidelines that will require clarification (if not deletion) relate to the definition of reproducible scientific research information and the mechanisms for determining that data meet some unclear definition of reproducibility. As you are certainly aware, the process of determining that data are reproducible and consistent can be very complex and unique to different areas of research. Rather than attempting to develop an administrative mechanism for insuring reproducibility in all possible areas, it might be more appropriate to rely on existing review procedures such as peer review panels, or requirements related to publication in scientific journals.

Given these and other concerns about the proposed guidelines, we suggest that OMB request an extended deadline for comment beyond the current date of September 30th 2001.

Thanking you for your attention to our concerns.

Sincerely,

Robert N. Shelton
Executive Vice Chancellor
and Provost