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The Office of Management and Budget should withdraw the proposed Bulletin and engage the scientific community in an open, transparent process.

This proposed OMB Bulletin "Peer Review and Information Quality" is fundamentally flawed in its intent as well as content. Implementation in its current form would serve little value; its costs will be substantial, and its benefit, at least to the public's health and environment, will likely be negative.

There is no evidence that the current system is not working. In addition, it will be difficult to obtain independent, knowledgeable peer-reviewers to review the large numbers of documents, many of which will

contain no new science. The new demand for peer reviewers is likely to have

negative consequences on the already strained peer review systems utilized by many agencies.

An even bigger problem is the fact that the proposal's conflict of interest requirements appear to be written in a way that will preclude the participation of academic scientists whose work is supported by federal funding, but not exclude industry scientists who work for regulated parties. This is patently ridiculous! It would exclude almost all academic scientists except those with dubious credentials since all academic scientists are required by their universities to look for federal funding.

Recognizing that peer review of science in the regulatory context is an important process, the scientific community should be engaged in this discussion. The National Academy of Sciences is an appropriate forum for such a discussion. The Academy has issued several important reports on agency peer review, as well as on broader issues relating to the role of science in regulation. The OMB should withdraw the proposed Bulletin and engage the scientific community in an open, transparent process.

Sincerely yours,
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