

Office of the Vice President  
for Research

13 August 2001

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

Dear Dr. Dickson:

I am writing to express my concerns regarding "Proposed Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by Federal Agencies" published in the Federal Register on June 28, 2001.

While the Higher Education Associations and attorneys have presented their views regarding this proposed rule, I want to provide you with a scientist's view. I am a researcher and currently the Vice President for Research at Stony Brook University. Scientists are taught to critically examine their own work and that of their colleagues and peers within their own areas of expertise. Much of what is published is beyond the understanding of the "general" public, whatever that may encompass. Published articles on research findings are peer reviewed and they receive critical analysis once published. No better standard could be adopted to guarantee quality of information.

The proposed rule seems to imply that beyond all of the critical reviews conducted by experts in any particular field, there should be an additional layer of review that is aimed at "protecting" the general public. Scientists welcome critical review of their work from any source and in fact most scientific journals publish letters to the editor that come from both colleagues and concerned citizens.

The proposed guidelines will most definitely curtail the ongoing inquiry that has made this nation a leader in science. I strongly object to the proposed rule and wanted to ensure that my voice is heard.

Sincerely,

*Gail S. Habicht*  
Gail S. Habicht  
Vice President for Research

GSH:ejm

cc: Shirley Strum Kenny  
Janice Rohlf  
Robert L. McGrath