



## American Public Health Association

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December 11, 2003

Dr. Margo Schwab  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
New Executive Office Building, Room 10201  
Washington, DC 20503  
By email: [OMB\\_peer\\_review@omb.eop.gov](mailto:OMB_peer_review@omb.eop.gov)

Re: Proposed Bulletin on Peer Review and Information Quality

Dear Dr. Schwab:

On behalf of the American Public Health Association (APHA), the largest and oldest organization of public health professionals in the nation, representing more than 50,000 members from over 50 public health occupations, I write to urge the Office of Management and Budget (OMB) to withdraw or significantly revise its proposed Bulletin on Peer Review and Information Quality. APHA has serious concerns regarding the proposal and its potential negative impact on public health and environmental regulation.

While the proposed Bulletin is intended to further ensure that the quality of information released by federal agencies meets consistent standards and that major federal regulations and related actions are based upon “sound science,” we believe the proposal may instead delay the implementation of important public health protections by our public health service agencies. We are unaware of any evidence that the current system is not working or any examples of inappropriate or flawed federal regulations being promulgated as a result of failure to peer review.

Under the proposal, OMB would require peer review of all significant regulatory information that is used or disseminated by a federal agency. While the stated purpose of the proposed OMB guidelines are to improve the quality of data and information used or disseminated by federal agencies, the guidelines contain criteria for selecting peer reviewers that will disrupt the balance and independence of scientific expertise to the detriment of public health by disqualifying reviewers if they are currently receiving or seeking funding from the agency through a contract or research grant, have expressed specific views on the issue in the past, or have conducted peer-reviews of the agency in the past. At the same time, reviewers who work for regulated parties are only subject to disqualification as reviewers if they have a “financial interest in the matter at issue.”

APHA believes that, if the proposed Bulletin is implemented it will be difficult to obtain knowledgeable peer-reviewers, who must meet rigorous if not unrealistic standards of independence, to review a large number of documents. The new demand for peer reviewers is likely to have negative consequences on the already strained peer review systems utilized by many agencies.

Based on these concerns we ask that the OMB Bulletin be withdrawn or significantly altered to allow regulatory agencies to adopt review processes that are most appropriate for their charge and mission. Thank you for taking our comments into consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Georges C. Benjamin". The signature is fluid and cursive, with a large, stylized initial "G".

Georges C. Benjamin, MD, FACP  
Executive Director