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

Dear Ms. Dickson:

We wish to offer comments regarding proposed guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies. Despite the fact that these requirements are imposed on agencies and not directly on the recipients of federal funding, research universities generate much of the data which gets distributed by the Government. We therefore believe that any guidelines implementing Public Law 106-554 have the potential to have a large impact on the higher education sector.

Most of the data produced at this institution flows out of basic research. The proposals which are submitted for funding are peer-reviewed for scientific merit; the competition is fierce for these funds and only the top-ranked studies are chosen for awards. The resulting data are reported primarily in scholarly journals which again, choose only those articles which are judged by experts in the field to be worthy. Thus, the process already incorporates the highest standards for quality, objectivity, utility, and integrity. We would urge, therefore, that the reference under section V.B.ii.a of the proposed guidelines be revised to say, "With respect to scientific and statistical information, the peer review process meets the standard for independent verification."

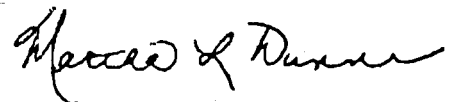
Regarding the utility of the data, we would stress that with scientific information, and especially with regard to basic research, utility may not be readily apparent. New knowledge in itself may not lead to any immediate practical outcome, but may serve as a building block for another's work. In addition, it is always subject to further research and ongoing verification. In addition, and specifically in section V.1.A of the guidelines, the expectation that the information disseminated to users be useful to everyone to whom it is disseminated is neither possible nor desirable. This is especially true of scientific information which is highly specialized and the result of many years of training. We would contend that the application process verifies utility to the mission of the funding agency and that, again, the rigorous review process should be viewed as providing adequate verification of utility for the purposes of these guidelines.

We believe that there needs to be a clear definition of "affected persons" who, according to these proposed guidelines, will not only have access to information, but the opportunity to have information corrected. Such a definition will need to take into consideration "bad faith" requests for correction of information. In addition, because of the preliminary nature of much of the scientific research information delivered to agencies, we believe that such material should not be considered as subject to challenges. As indicated above, correction and verification are part of the ongoing research process. Procedures for protecting private personal information obtained from human participants in research and intellectual property rights of scientists will also have to be factored in to any resulting guidelines.

Finally, the cost to agencies to implement the proposed requirements may well be prohibitive. Agencies will need to be given some discretion in evaluating the cost/benefit ratio of any requests for independent analysis of underlying data.

For all of the above reasons, we urge OMB to state explicitly in whatever regulations emerge from the comment period that agencies may not place additional burden on the scientific community, either directly or by requiring procedures that would result in substantial delays for publication and that would impose a process that would divert funds from research support. We appreciate the opportunity to comment.

Sincerely,



Martha L. Dunne
Director