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To:            Brooke Dickson Information Quality/OMB/EOP@EOP

cc:

Subject: 66 FR 34489

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August 13, 2001

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

Subject:            Proposed Guidelines for Ensuring and Maximizing  
                         the Quality, Objectivity, Utility and Integrity of  
Information  
                         Disseminated By Federal Agencies. (66 FR 34489)

Dear Ms. Dickson:

P.L. 106-554, Section 515, requires the Office of Management and Budget (OMB) to prepare policy and guidance to federal agencies for ensuring and maximizing the quality, objectivity, utility and integrity of information (including statistical information) disseminated by federal agencies. Colorado State University supports OMB's basic philosophy that the agencies should adopt common sense systems that minimize the burden of implementation by relying as much as possible on established agency procedures and processes.

We understand that these requirements are imposed on agencies and not directly on recipients of federal support, with a few exceptions. However, research universities generate much of the scientific information that is critical to federal agencies in the material they distribute. Under the proposed guidelines, some agency dissemination of scientific information arising from research conducted at universities has the potential to be treated in a manner that could be quite damaging to the government-university research partnership by discouraging the sharing of qualified research information and thereby potentially denying the public and others the ultimate benefit of the information.

Specific concerns include:

\*            Guidance for maximizing standards of excellence, which the university research community has adopted and to which it is committed in

conducting research, have not yet been formulated by OMB with sufficient care.

\* The proposed opportunity for independent analysis of underlying data could have serious adverse impacts on research. Without the assurance that private personal information will be protected, it will be impossible to recruit human participants into research programs. Absent assurance that their intellectual property will be protected; our most creative and productive scientists may no longer want to participate in the government-university partnership.

\* The impacts of costs and delays in publication that could result from this guidance. We specifically urge OMB to state explicitly that the statute cannot be interpreted by agencies to place additional burdens on the scientific community, either directly or by requiring procedures that would result in substantial delays for publication or that would impose a process that would divert funds from research support.

The Council on Governmental Relations (COGR) in its comment letter of August 8, 2001, has presented some very thoughtful comments on the proposed guidelines. Colorado State University concurs with those comments and requests that OMB revise its proposed guidance and republish the revised guidance as a draft for public comment.

We appreciate the opportunity to comment on these proposed guidelines.

Sincerely,

Anthony A. Frank, D.V.M., Ph.D.  
Vice President for Research & Information Technology  
Colorado State University