



August 14, 2001

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

Dear Ms. Dickson

The "Proposed Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated By Federal Agencies" was recently published in 66 FR 34489. We strongly support OMB's basic philosophy that federal agencies should adopt common sense systems that minimize the burden of implementation by relying as much as possible on established agency procedures and processes. However, under the proposed guidelines, we believe some agency dissemination of scientific information arising from research conducted at Universities has the potential to be treated in a manner that could be damaging to the government-university partnership by discouraging the sharing of qualified research information and thereby potentially denying the public and others the ultimate benefit of the information.

P.L. 106-554, Section 515 requires that OMB prepare policy and guidance to federal agencies for ensuring the quality, objectivity, utility, and integrity of information disseminated by federal agencies. We believe publications subjected to peer review have already met the scientific community's traditional and effective criteria of objectivity, reproducibility, the clarity of presentation and the integrity of data. Many research-supporting agencies currently rely on the peer review process for consideration of projects to fund and renew. Journals assure that only the best projects with the most promising research results are disseminated. The most effective way for agencies to implement the statute is to recognize and adopt the traditional scientific standards as the exclusive basis for disseminating peer-reviewed information.

As a research intensive university, we are a member of the Counsel on Governmental Relations and endorse their recent letter to you in this subject. We urge OMB to revise its proposed guidance 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.

appreciate the opportunity to comment on these proposed guidelines

Sincerely,

Jerry J. Baudin

Vice Chancellor for Finance and Administrative Services

JLB:drr

cc: Vice Chancellor Smith
Ms. Kate Phillips