

From: Chris Hoofnagle <souvarine@earthlink.net> on 09/07/2003 01:20:13 PM

Please respond to Chris Hoofnagle <souvarine@earthlink.net>

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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP

cc:

Subject: Peer Review Comments

Greetings, I am commenting on the OMB's guidance for peer review requirements under EO 12866.

I have two suggestions: First, require those who submit analyses to the government for policy guidance to issue financial disclosures. They should disclose whether 1) they have a financial interest in the policy 2) whether their employer or institution has a financial interest in the outcome 3) whether they were paid and by whom they were paid to author the study 4) whether the funder of the study has "veto authority" over the study--the ability to prevent its publication if the funder does not like the results. These disclosures should be made available to the public with the study or analysis.

Second, base evaluations of studies on "20 Questions Journalists Should Ask About Poll Results," which was formulated by the National Council on Public Polls. Many of the questions suggested could be adopted to a study or scientific analysis.

The 20 Questions Standard is available at:

<http://www.publicagenda.org/aboutpubopinion/aboutpubop1.htm>

Sincerely,
Chris Hoofnagle