OMB's new memorandum on risk assessment is only the latest in a series of Bush administration policies that bury risk assessments under layer after layer of requirements. The new risk memo adds so-called "Good Guidance Practices" policies (Exec. Order No. 13,422 and related bulletin) on top of the requirements already in place under the Data Quality Act Guidelines and OMB Peer Review Guidelines.

**Risky Business: Sullying Science With Politics Yet Again**

**DOWN THE RABBIT HOLE**

How OMB Has Buried Risk Assessments

Under Requirement After Requirement

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*Develop draft risk assessment*

If influential, should be "reproducible"

*Submit to peer review*

**Influential**

"will have or does have a clear and substantial impact on important public policy or private sector decisions?"

*Submit to political review*

If significant or economically significant:

- review and approval by senior agency staff
- AND review and approval by OIRA

**Highly Influential**

"could have a potential impact of more than $500 million in any year, or is novel, controversial, or precedent-setting or has significant interagency interest"**

*Add to online peer review agenda*

Submit to peer review panel

must exclude agency experts unless "a premier government scientist is (a) not in a position of management or policy responsibility and (b) possesses essential expertise that cannot be obtained elsewhere" and is employed by a different agency of the Cabinet-level department

*Publish final*

*Submit to public challenge*

How significant is it?

**Significant**

Interagency conflict, novel legal or policy issues, materially alter budgeted programs

**Economically significant**

Annual effect $100 million, or adversely affect economy, jobs, etc.

Post online, allow public comment

Publish in Fed. Reg., open for comment period, prepare formal response-to-comments document

Submit to public

Whenever feasible and appropriate, the agency shall:

- make the draft scientific assessment available to the public for comment at the same time it is submitted for peer review (or during the peer review process) and
- sponsor a public meeting, where oral presentations on scientific issues can be made to the peer reviewers by interested members of the public.