



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

September 4, 2019

James E. Enstrom, PhD, MPH, FFACE  
UCLA and Scientific Integrity Institute

OFFICE OF THE  
SCIENCE ADVISOR

Dear Dr. Enstrom:

Your allegation of a violation of EPA's Scientific Integrity Policy in the draft Integrated Science Assessment for Particulate Matter was referred to me by EPA's Scientific Integrity Official.

As you know, EPA released the draft assessment for public review and comment in October 2018. The Chartered Clean Air Scientific Advisory Committee peer-reviewed the draft assessment at a public meeting in December 2018. The Committee discussed their draft review during a public teleconference in March 2019, for which you submitted two pages of comments and thirty pages of attachments critical of EPA's draft assessment and supportive of the Committee's draft review.

The role of EPA's Scientific Integrity Policy in this matter is "To ensure that scientific products undergo appropriate peer review by qualified experts." (See EPA's Scientific Integrity Policy, section IV.C.) The Policy cites EPA's Peer Review Handbook as the source of information and options for conducting peer reviews. The Policy explicitly recognizes formal reviews by federal advisory committees (of which the Clean Air Scientific Advisory Committee is one) as an important tool "for ensuring the credibility and quality of Agency science, enhancing the transparency of the peer review process, and providing for input from the EPA's diverse customers, partners, and stakeholders." Accordingly, peer review by a federal advisory committee with the accompanying public comment satisfies the requirements of EPA's Scientific Integrity Policy.

Your comments to the Clean Air Scientific Advisory Committee mention the word "falsification." In the context of research misconduct, falsification does not include the differences of opinion present in this matter. Your views and those in the draft assessment were presented to the peer review committee, and EPA is considering the comments of the peer reviewers and the public. In this regard, the process has been followed. EPA's Scientific Integrity Program typically does not intercede on behalf of public commenters or evaluate the scientific merit of their differing opinions, as that would be a nontransparent interference in the peer review process.

Thank you for your interest in scientific integrity at EPA.

Sincerely,

A handwritten signature in black ink, appearing to read "Vincent Cogliano".

Vincent Cogliano, PhD  
Deputy to the Scientific Integrity Official