



May 11, 2018

Scott Pruitt
Administrator
Environmental Protection Agency
William Jefferson Clinton West Building
1301 Constitution Ave, N.W.
Washington, D.C. 20460

Administrator Pruitt:

The undersigned medical and public health organizations respectfully request a 60 day extension of the public comment period and public hearings to solicit additional public input on the proposed rule - Strengthening Transparency in Regulatory Science (RIN: 2080-AA14). This proposed rule raises many complex issues surrounding scientific data, patient confidentiality, research journal integrity and public health. Implementation of this rule will have significant impact for our members, our journals and the patients and communities we serve.

Many of our members participate in basic, clinical and epidemiological research that is used by EPA in policy making decisions. Additional time is needed to consider how EPA's revised data requirements will impact how research is conducted, how patient participation in research is impacted, and how data is shared with the broader community.

The undersigned medical and public health organizations also host peer reviewed scientific journals that publish important research studies that are frequently used by EPA and other federal agencies to develop regulatory policy. Additional time is needed for our societies to consider and comment on how implementation of this policy might impact our journals including data review policy, data access and permissions policy and costs and administrative burden implementation of this policy would have on our members and journals.

And we serve patients. Additional time is needed to understand and comment on how implementation of this policy will impact important science-based public health standards promulgated by EPA that have a direct impact on human health and the patients we serve.

We believe an additional 60 days in the public comment period and public hearings to solicit additional public comments are warranted for this important proposed policy.

Sincerely,

American Academy of Allergy, Asthma and Immunology
American Academy of Dermatology
American Academy of Pediatrics
American College of Emergency Physicians, California Chapter
American College of Obstetricians and Gynecologists
American College of Occupational and Environmental Medicine
American College of Preventive Medicine
American Medical Association
American Podiatric Medical Association
American Public Health Association
American Thoracic Society
Association of Schools and Programs of Public Health
European Respiratory Society
International Society for Environmental Epidemiology
Physicians for Social Responsibility