November 6, 2017

The Honorable Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C.  20460

Subject: EPA Advisory Boards and Committees

Dear Administrator Pruitt:

The undersigned higher education associations urge you to reconsider your October 31, 2017 directive barring scientists who receive Environmental Protection Agency (EPA) grants from serving in advisory roles, due to a purported conflict of interest or lack of objectivity. While efforts to broaden participation in agency advisory committees are reasonable, as currently written, the directive will remove the nation’s most proficient scientific experts from advisory panels that provide the EPA evidence-based advice in support of its mission to protect human health and the environment.

We strongly disagree with the unfounded premise that scientists who receive EPA grants cannot contribute to objective deliberation on EPA advisory committees. In fact, scientists who have successfully competed for grants are the very subject-area experts the agency should turn to for advice. U.S. federal agencies, including the EPA, have historically been world leaders in implementing effective scientific review and advisory systems, selecting the best scientists to conduct research on the agencies’ behalf and enlisting the best scientists to help advise the agencies in policy-making. Many other countries have implemented similar models due to the success of the existing U.S. standard.

The EPA, along with every federal grant-making science agency, has in place robust controls to ensure both transparency and accountability to the American taxpayer of the scientific review process, and for management of conflicts of interest. The process ensures that only the most qualified researchers are selected to conduct EPA research. To prohibit these same highly qualified experts from advising the EPA as members of its formal advisory committees is
nonsensical and will only impede – not help -- the agency’s ability to craft and implement well-informed policies on behalf of the taxpayer.

We urge you to withdraw the current directive and reconsider ways to ensure that both your agency and the American people continue to reap the benefits of advice from America’s foremost scientists in the major environmental policy issues within the EPA’s jurisdiction. The scientific community would gladly assist in developing models that broadly engage sound and knowledgeable expert advice.

Sincerely,

Ted Mitchell
President
American Council on Education

Darrell G. Kirch
President and CEO
Association of American Medical Colleges

Mary Sue Coleman
President
Association of American Universities

Peter McPherson
President
Association of Public and Land-grant Universities

Anthony DeCrappeo
President
Council on Governmental Relations