

I am the inaugural John M. Eisenberg Professor of Medicine, Epidemiology, Medical Ethics, and Health Policy at the University of Pennsylvania, and one of two Americans to have been elected by their peers to each of the following four honorary societies: The National Academy of Medicine, the Association of American Physicians, the American Society for Clinical Investigation, and the Hastings Center.

I frame that intentionally because the fact that processes for election to each of these scientific and professional societies are by one's peers is hardly coincidental, as peer evaluation has been the cornerstone of science since well before the United States was founded and certainly for every day since 1776. But whereas it could plausibly (though I believe incorrectly) be argued that the world would not be substantially worse off if these professional societies were disbanded, it is simply untenable to argue that the world - and the US specifically - would not be worse off if the processes underlying scientific discovery were similarly abandoned. Yet abandoning science is precisely what this OMB proposed rule would do by relegating the importance of, or perhaps outright eliminating, the peer-review process.

Politicians have no more scientific expertise than scientists have political expertise. No one is - nor should be - proposing that scientists be charged with determining the structure of the US tax code, the regulation of elections, or laws governing interstate commerce. Yet there is as much justification for such absurd changes as there is for the changes proposed in this OMB document: politicians simply have no ability to determine what qualifies as science that best promotes the public interest.

We are already seeing the downsides of political interference with the scientific process. For example, the political appointee Roger Klein, acting director of AHRQ despite few if any qualifications to lead such an important organization, has unilaterally impounded more than \$50 million that was authorized through the PCOR trust fund to support 16 Centers of Excellence in the US focused on training the next generation of Learning Health System scientists. These centers, which reside roughly equally in traditionally Red and Blue states, had been training American citizens in the scientific techniques necessary for them to devote their careers to designing and evaluating ways to improve the quality and safety of health care in the US.

This work - which seeks to ensure that all Americans receive the right care at the right time and with the fewest burdens and delays - is particularly important in light of new

opportunities and challenges posed by the advent of AI. It goes without saying that all Americans - regardless of political affiliation - want health care that more quickly addresses their needs and reduces their risks for harms such as bloodstream infections and prolonged hospitalizations. Yet allowing unqualified political appointees to interfere with the scientific process imperils these universally held goals. This example is personal because I direct one of those 16 centers and have had to personally tell our most promising scientists that we can no longer train them. Yet the implications of this one example pale in comparison with the much-further-reaching implications of the OMB rule that would devastate and destabilize all forms of science, resulting in even greater loss of life and livelihood.

The US already is first among nations in spending on health care and yet 47th in life expectancy. It is this tragic state of affairs that programs such as the one I just described were intended to combat.

I urge you to at the very least extend the unusually (and to my knowledge unlawfully) brief comment period, and better yet to end consideration of this rule making entirely - rule making that is 100% arbitrary, capricious, and threatening to the health and wellbeing of all Americans.