

**From:** Beck, Nancy

**Sent:** Wednesday, November 28, 2012 08:29 PM

**To:** White, Lori (NIH/NIEHS) [E] <[whitelord@niehs.nih.gov](mailto:whitelord@niehs.nih.gov)>

**Cc:** Bucher, John (NIH/NIEHS) [E] <[bucher@niehs.nih.gov](mailto:bucher@niehs.nih.gov)>; Birnbaum, Linda (NIH/NIEHS) [E] <[birnbaumls@niehs.nih.gov](mailto:birnbaumls@niehs.nih.gov)>; Wolfe, Mary (NIH/NIEHS) [E] <[wolfe@niehs.nih.gov](mailto:wolfe@niehs.nih.gov)>; [Caya.Lewis@hhs.gov](mailto:Caya.Lewis@hhs.gov) <[Caya.Lewis@hhs.gov](mailto:Caya.Lewis@hhs.gov)>

**Subject:** RE: ACC comments for the NTP BSC

Lori,

Thank you for the follow-up note. While it is good to see the revised draft has finally been released, a one week comment period for review is not nearly sufficient. One week will not give us sufficient time to do outreach to all our members and then organize constructive comments on the revised draft.

The process for developing and finalizing the Systematic Approach has been very unclear. Seeking BSC approval and sign-off on the revised draft at the December meeting, without meaningful opportunity for public review and comment, as well as time for full consideration of such comments by the BSC, is not consistent with the President's commitment to transparency and public involvement. Alternatively, if this is solely an informational meeting, it would be helpful to share with the BSC, and the public, a timeline and plan for stakeholder engagement and peer review. As suggested in our comments, there are three procedural changes we would like to see:

1. NIEHS/NTP must embrace and fully adhere to the President's commitment to transparency and public involvement and adopt, as standard operating procedure, open meetings of all FACA committees, including all meetings of FACA workgroups.
2. NIEHS/NTP should adopt a practice of simultaneous public dissemination of every program document, draft or final, which it circulates to its BSC (including BSC working groups) for review as a standard operating practice.
3. NIEHS/NTP should release the revised draft "NTP Approach for Reaching Conclusions for Literature-Based Evidence Assessments," for a 60-day public comment period, and then provide an opportunity for meaningful oral public presentation to the BSC. This action should be completed before NTP proceeds with implementation.

Thank you for considering our comments.

Regards,

Nancy

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*Nancy B. Beck, Ph.D., DABT*

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-----Original Message-----

From: White, Lori (NIH/NIEHS) [E] [<mailto:whiteld@niehs.nih.gov>]

Sent: Wednesday, November 28, 2012 11:30 AM

To: Beck, Nancy

Cc: Bucher, John (NIH/NIEHS) [E]; Birnbaum, Linda (NIH/NIEHS) [E]; Wolfe, Mary (NIH/NIEHS) [E]

Subject: Re: ACC comments for the NTP BSC

Dear Dr. Beck,

Thank you for the public comments from the American Chemistry Council. They will be posted to the BSC meeting page and distributed to the board and NTP staff. We want to let you know that the NTP is extending the deadline for receipt of written public comments to December 6 and welcomes additional input from the ACC.

The revised draft NTP approach is available at <http://ntp.niehs.nih.gov/go/38173>.

Sincerely,

Lori White

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Lori White, PhD, PMP

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On 11/27/12 6:33 PM, "Beck, Nancy" <[Nancy\\_Beck@americanchemistry.com](mailto:Nancy_Beck@americanchemistry.com)> wrote:

Dr. White,

On behalf of ACC, attached are comments for the NTP Board of Scientific Counselors meeting which will be held Dec 11, 2012.

Please let me know if you have questions or require further information from us.

Regards,

Nancy

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Nancy B. Beck, Ph.D., DABT

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