CalEPA Peer Review Program
Guidance for Reviewers

Updated June 2023

Communication with the CalEPA Peer Review Program. To ensure a clear record of our communication, all our communications should be in writing (email is preferred).

Confidentiality. You are required to help maintain the confidentiality of this review process.

- Confidentiality began at the point you were contacted by the University of California, Berkeley (UC).
- You should not inform others about your role as reviewer.
- You will not know the names of other reviewers until all reviews are complete and the requesting organization decides to release reviews.
- You are not allowed to discuss the proposal with employees of the requesting organization or individuals who participated in development of the proposal. The individuals who participated in development are listed in Attachment 3 of the review request. Please let the CalEPA Program know if you have a question, and we will provide the support between you and the requesting organization.

Independence. If you learn what you are reviewing was developed by someone with whom you share a common supervisor or have or had a working relationship, you must let us know so that we can determine whether to seek another peer reviewer. For example, if the CalEPA organization asking for the review contracted with someone in your department or organization to help develop the material you were asked to review, you have a potential conflict of interest.

Your review. The statutory mandate for external scientific peer review (California Health and Safety Code Section 57004) states that the reviewer's responsibility is to determine whether "the scientific portion of the proposed rule is based upon sound scientific knowledge, methods, and practices." Your review should take into account both the scientific basis for the proposed rule and the intended application or implementation of that science in the context of the proposed rule.

Note: you are also invited to identify and address additional subjects that should be considered as part of the scientific basis of the proposed rule, and to consider, whether you conclude the proposed rule, taken as a whole, is based on sound scientific knowledge, methods, and practices.

You may have been asked to review the implementation or application of science that has previously been peer reviewed. In some cases, there is a clear, previously reviewed scientific basis for what you are reviewing but the scientific basis of a new

implementation of the science still must be reviewed. For example, the scientific foundation for a drinking water standard may have been reviewed when the drinking water standard was adopted, but you might determine that the same scientific foundation does not support the use of the same standard to protect aquatic life in a river.

You may ask for clarification or for additional specific supporting documents. We will provide what we can to you and all reviewers. Send clarification questions to the CalEPA Program.

Text to include in your review.

- Your name, professional affiliation, and the date.
- The name of the item you are reviewing.
- Begin your review with, “Based on my expertise and experience, I am reviewing the findings, assumptions, or conclusions I agreed I could review with confidence:” and list them by number, as they are referred to in Attachment 2 of the review request.

Formatting your review. To ensure all people can perceive, understand, navigate, and interact with the materials posted on CalEPA websites, files posted on these websites must meet accessibility criteria. Your peer review may be posted on a CalEPA website so you must submit your review in an accessible format. The recommended way to make your file accessible is to use Microsoft Word to write your review and to use only basic text and headings during document creation. Then, run the built-in Word Accessibility Checker and resolve any accessibility issues.

Making your review accessible is your responsibility but staff at the UC may be able to assist you by suggesting changes for your approval.

General accessibility criteria include:

- Text. Text should be black, in Arial, size 12 points or larger.
- Non-text elements. If you use them, equations, graphs, figures, images, charts, or tables must follow accessibility criteria regarding meaningful captions and alternative text.
- Layout. Avoid complex document layouts, such as having text in more than one column, use of text boxes, use of color, and applying different font styles (i.e., bolding, underlining, etc.). It’s best to avoid letterhead, signatures, headers, and footers, aside from page numbers.
- Other requirements. There are also additional accessibility formatting requirements, including meaningful hyperlink text and appropriate use of styles for headings and lists.

The links below provide some information on accessible online content:

- Resources for Creating Accessible Content (created by the California Department of Rehabilitation).
- Video lessons for accessible Word documents (created by Microsoft).
- State, Federal, and Other Related Laws & Regulations on Digital Accessibility (created by the California Department of Rehabilitation).

You may be asked to supplement your review. The organization requesting the review may require clarification or additional information on a specific subject. If this occurs, the CalEPA Program will contact you to revise your review to address those comments.

If you are asked to discuss your comments. After you have submitted your review, you may be approached by third parties, the press, or by colleagues. You are under no obligation to discuss your comments with them and we recommend that you do not. Outside parties are provided an opportunity to address a proposed regulatory action during the public comment period. Discussions outside the provided avenues for comment could seriously impede the established process for vetting the proposal under consideration. Please direct third parties to the CalEPA Program.