LETTERS

Allocation of EPA Funds

Two major thrusts of the Administration are elimination of unnecessary regulation and, more recently, using technology to enhance productivity. As the Environmental Protection Agency (EPA) can contribute to both of these, one would expect that the 1984 research budget would reflect these initiatives. Even a cursory examination, however, reveals at least two inconsistencies with stated policy—and with common sense.

A noncontroversial way to avoid regulation is to show that it isn't needed. Or, if an environmental problem can be discovered while it is still small, it might be resolved with a minimum of social and economic dislocation. The EPA Exploratory Research Program accomplishes both by funding peer-reviewed investigators engaged in problem-*definition* research. The program has worked because it is managed by EPA's Office of Research and Development (ORD) as a deliberate complement to the problem-*solving* R & D done by that office. But the 1984 budget shows that, of the $10 million total, $4 million is to be "passed through" to the National Science Foundation. Even if one grants no loss through administrative and management problems—an unlikely event—such an arrangement will shift the $4 million toward *basic* environmental research rather than toward the problem-definition mode needed to avoid future problems.

The second inconsistency of budget with policy is less subtle. Industry, hit by regulation, too often responds by Rube Goldberg, bucket-at-the-end-of-the-pipe add-ons or, worse, fights in court while it continues to pollute. For years, ORD's Industrial Research Program has provided a constructive alternative—seed money from the government allows industrial research on "process modification." When successful, a new way to produce a product is found, a way that not only results in less pollution but generally uses less raw material and less energy, is less costly, and sometimes results in useful by-products. Small wonder that the new process can become the industry standard.

While it is true that industry conducts this sort of research on its own, the successful results can be proprietary and not generally available. Or they can be so simple as to be unpatentable and then not worth the development investment. Thus, left to itself, industry does not put a high priority on process modification.

Just at the moment the Administration is pushing new technology as the key to productivity, the EPA's process modification work and seed money for more efficient control technology have been eliminated from the 1984 budget.

Perhaps in reconsidering EPA's priorities and management, the Administration should weigh the benefits of structuring it as an environmental protection organization with a suite of instruments: research, public information, grants-in-aid, regulation, enforcement, and so forth, rather than as a primarily regulatory organization assisted by supporting functions. If the concept is attractive, a good way to begin would be to examine the research budget for consistency with some laudable policies of the present Administration.

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AMA's Technology Assessment

I take issue with Marjorie Sun's description of a new American Medical Association (AMA) program for technology assessment (News and Comment, 7 Jan., p. 37). The AMA's Diagnostic and Therapeutic Technology Assessment (DATTA) program will provide the best medical opinions of selected procedures and techniques by the professionals responsible for their use. These opinions will be solicited from a representative group of recognized experts drawn from a larger roster of physicians nominated to serve by their various medical specialties or state societies or by the AMA's Council on Scientific Affairs. The DATTA program will not be taking an "opinion" poll of the membership, as suggested by Sun. Instead, a synthesis of the individual responses will be prepared by staff. This synthesis will then be reevaluated before final review by the Council on Scientific Affairs and the publication of conclusions.

In the DATTA program and in many other ways, the AMA is working to bring to practitioners and patients what Seymour Perry has described (*1*, p. 1097) as "current information concerning the safety, effectiveness, and comparative values of technologies communicated in an understandable form." Considerable effort is also being spent on imbuing in practitioners the cost implications of their decisions.

The AMA believes the exercise of good judgment by physicians in the