FACA and Science Integrity

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FACA’s Protective Impact

- Agencies can ignore advice
- But
  - Legal price
  - Political price
Avoiding FACA

- Doesn’t apply
  - Contractor loophole
  - Participant loophole
- Stack the committee
  - Avoid “conflict of interest” rules
    - Appoint “representatives”
    - Grant “waivers”
  - Avoid “balance” requirement
FACA Amendments

- Closes loopholes
- Addresses Conflicts of Interest
  - Not strong enough
- Adds transparency