

#	Section	Commenter	Comment	Staff Response
1	1737.15(a)	Kaiser	<p>We appreciate the Board's continued willingness to discuss this section of the regulation. In response to our comment letter dated February 20, 2025, Board staff responded, "the recommendation to add in a provision for the study to be 'peered reviewed' does not ensure an independent reviewer is involved." We find the Board's feedback perplexing as peer review is the gold standard process for independently evaluating the methodological rigor of a study. The University of California Office of Scholarly Communication describes peer review as the process by which "reviewers who are experts in the topic at hand... review new scholarship for relevance, accuracy, and importance to the field." Typically, during peer review, "the identities of the reviewers and authors are kept anonymous to mitigate the risk of bias." Therefore, we continue to recommend amending the regulation text to indicate that the study must be published in a peer-reviewed journal.</p> <p>Deactivating, decontaminating, cleaning, disinfecting, and sporicidal agents shall be used in accordance with manufacturers' specifications, or subsequent manufacturer approved studies <u>published in a peer-reviewed journal</u>, and shall be surface compatible.</p>	<p>Board staff have reviewed the comment and do not recommend a change in the proposed text. Board staff note that the comment is outside the scope of the proposed changes in the fourth modified text.</p> <p>Board staff note that the Board previously considered a similar comment from the commenter and determined that changes to the regulation text were not appropriate. In addition to the Board's prior comments, the Board notes that, while outside the scope of the Board's jurisdiction, it may be appropriate for the commenter to contact other regulators that oversee the approval of cleaning agents to discuss options to update the use of such agents based manufacturer's specifications.</p>