February 15, 2019

PRIM&R’s response to Request for Information: Input on Draft Report from Working Group on Reducing Administrative Burden to Researchers for Animal Care and Use in Research (Federal Register Notice 2018-26557).

Submitted electronically at: https://grants.nih.gov/grants/rfi/rfi.cfm?ID=83

Public Responsibility in Medicine and Research (PRIM&R) appreciates the opportunity to comment on the federal Working Group’s draft report, "Reducing Administrative Burden to Researchers for Animal Care and Use in Research."

PRIM&R is a nonprofit organization dedicated to advancing the highest ethical standards in the conduct of research. Since 1974, PRIM&R has served as a professional home and trusted thought leader for the research protections community. Through educational programming, professional development opportunities, and public policy initiatives, PRIM&R seeks to ensure that all stakeholders in the research enterprise appreciate the central importance of ethics to the advancement of science. We serve the animal research community, specifically, by providing professional and educational support to members and staff of Institutional Animal Care and Use Committees (IACUCs) in their critical work of ensuring the ethical care and use of research animals.

We appreciate that the Working Group took the time to acknowledge and respond to the full range of comments submitted by the animal research community in response to the National Institutes of Health (NIH)’s Request for Information (RFI): Laboratory Animal Welfare: Coordination and Harmonization of Regulations and Policies published in the Federal Register March 14, 2018. In particular, changes such as enhancing flexibility around scheduled IACUC inspections, harmonizing annual reporting expectations, streamlining technologies to facilitate report submissions, and agency coordination for training will all be welcomed by the animal research community. We recognize that several recommendations made in response to the original RFI, including some of PRIM&R’s, would require statutory changes beyond the purview of the Office of Laboratory Animal Welfare (OLAW) and the US Department of Agriculture (USDA); we hope the Working Group will include these suggestions—especially, amending the law to allow...
all vertebrate species to be brought under one harmonized regulatory framework—in any reports they plan to share with members of Congress who can affect such changes. For further reference, PRIM&R’s original comments can be found here: https://www.primr.org/WorkArea/DownloadAsset.aspx?id=13682.

With respect to changes that the OLAW and USDA themselves have the power to implement, we note that very few of the proposals have definitive timelines attached. The animal research oversight community, which is invested in the goal of reducing unnecessary burdens that do not serve the welfare of research animals, is eager to understand the agencies’ plans for solidifying and implementing their proposed changes. To take just one example—the re-evaluation of USDA Policy #12 regarding the consideration of alternatives—PRIM&R would be interested in knowing the USDA’s planned timetable and mechanism for making a new policy manual available for public comment. More generally, we look forward to the agencies implementing a process for following up on their proposed changes that will keep the research oversight community informed and involved in determining the final product.

Thank you again for the opportunity to comment. My PRIM&R colleagues and I are available to discuss our comments further, should that be of interest. Please feel free to contact me at 617.303.1872 or ehurley@primr.org.

Respectfully submitted,

[Signature]

Elisa A. Hurley, PhD
Executive Director

cc: PRIM&R Public Policy Committee, PRIM&R Board of Directors