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Submitted electronically at: Administrative-Reform@nsf.gov


Dear Members of the NSB Task Force on Administrative Burden:

PRIM&R is a 39-year-old nonprofit organization dedicated to advancing the highest ethical standards in the conduct of research. We accomplish this goal by providing educational programming and professional development services to the full array of individuals and organizations involved in biomedical, social science, and behavioral research, particularly the members and staff of institutional review boards (IRBs). Through conferences and other educational activities, PRIM&R provides balanced, thorough, and accurate information on a range of ethical and regulatory issues affecting research.

PRIM&R respects the desire to reduce unnecessary administrative burdens on researchers and research institutions, and the possible benefits to research progress and public health such reductions might produce. We also recognize that many of the most burdensome aspects of the regulations governing research have nothing to do with protecting the human subjects and animals used in that research, but instead with reporting and accounting requirements. Nevertheless, we strongly urge the Task Force to recognize that the primary goal of any undertaking to reduce administrative burden must not, in any way, compromise the need to protect and respect research subjects.

We believe it is possible to develop a regulatory system that both imposes fewer (unproductive) burdens and enhances the protection of subjects. As the Task Force considers the responses it receives from research institutions, investigators, and industry and crafts its own recommendations for streamlining oversight, we strongly urge it to focus on the essential duty of all persons and entities engaged in research to respect and protect research subjects.

PRIM&R appreciates that the National Science Board’s Task Force on Administrative Burden has requested input from the research community on this important issues, and is grateful for the
opportunity to share its views. If you have any questions, or if we can provide any further information, please feel free to contact me at (213) 740-2557 or acapron@law.usc.edu.

Respectfully submitted,

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Cc: Board of Directors, Public Policy Committee