COGR
Advancing Effective Research Policy

October 31, 2025

Sent Via Email to: nina.b.cisar.civ@health.mil and krinon.d.moccia.mil@hearlth.mil

U.S. Army Medical Research and Development Command
Animal Care and Use Review Office (ACURO)
Attention: Ms. Nina Cisar, ACURO Manager and Lieutenant Colonel Krinon Moccia, ACURO Director

cc: Office of Human and Animal Research Oversight at dha.detrick.mrdc.mbx.oharo@health.mil

RE: **ACURO Notice Concerning Acceptance of Only Department of Defense Fully-Funded IACUC Protocols for Review and Approval**

Dear Ms. Cisar and Lieutenant Colonel Moccia:

COGR is the national authority on federal policies and regulations affecting U.S. research institutions. We provide a unified voice for over 225 research universities and affiliated academic medical centers and research institutes. Our work strengthens the research partnership between the federal government and research institutions and furthers the frontiers of science, technology, and knowledge. We advocate for effective and efficient research policies and regulations that maximize and safeguard research investments and minimize administrative and cost burdens.

Many of our member institutions conduct animal research that is funded in whole or in part by the Department of Defense (DOD). Several of these institutions contacted COGR to raise concerns about ACURO's recent notice advising that effective January 1, 2026, ACURO will no longer review protocols that describe research projects that are only partially supported by a Department of Defense (DOD) award subject to ACURO oversight ("Review Directive"). The Review Directive states that this change in approach is necessary to reduce administrative burden on ACURO staff in a time of fiscal austerity and increased focus on animal research.

COGR fully supports efforts to reduce administrative burden while ensuring robust review of animal research protocols, particularly in this time of increasingly constrained federal financial support for research of all types. Efforts to reduce such burden align with the Trump Administration's goal to reduce unnecessary regulatory burden as expressed in Executive Order 14219, Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative (Feb. 19, 2025) and Executive Order 14192, Unleashing Prosperity through Deregulation (Jan. 31, 2025), as well as in the April 9, 2025, Presidential Memoranda, Directing the Repeal of Unlawful Regulations and the Office of Management and Budget's recent implementing guidance in M-25-36, Streamlining the Review of Deregulatory Actions (Oct. 21, 2025).

ACURO's change in procedures will indeed reduce administrative burden on ACURO staff. However, given that IACUC protocols routinely describe research funded by multiple sources, that burden will not be eliminated or reduced, but instead shifted to similarly resource-constrained institutional IACUCs, researchers, and administrative staff. Importantly, this process change does nothing to improve the health, safety, and welfare of research animals. Rather, it further taxes IACUC and researcher time and resources by requiring researchers and IACUC members and staff to develop, review, and provide oversight for numerous additional protocols encompassing the same research. This change will be particularly difficult for ongoing protocols requiring triennial review because researchers will be forced to re-write existing protocols to segregate DOD-funded components and include them in separate protocols.

We urge ACURO to re-evaluate its current path and consider taking one or more of the following courses of action that serve to actually reduce unnecessary administrative burden ***on both*** ACURO and institutions while ensuring robust protections for animal research subjects:

- **Terminate the ACURO protocol review requirement altogether and rely solely on institutional IACUC review of protocols, as most federal funding agencies already do**. This option substantially reduces burden on ACURO and institutions by ending duplicative review and freeing up both agency and institutional resources to support other aspects of research animal care and use programs. Notably, the National Academies for Sciences, Engineering & Medicine's 2025 report *Simplifying Research Regulations and Policies* points out that ACURO review is not required from a regulatory or policy perspective and is duplicative of already existing IACUC requirements. [Report at p. 95].

- **Exempt any on-going protocols that involve multiple funding sources from the Review Directive**. This approach would enable institutions to implement the new requirement for protocols initially reviewed on or after January 1, 2026, while not being required to re-write ongoing protocols up for triennial review.

- **Extend the January 1, 2026, deadline for institutions to comply with the Review Directive**, particularly if ongoing protocols are not "grandfathered in" as suggested above. This approach will give researchers and IACUCs additional time to ensure that new and ongoing protocols and review processes align with the new requirement.

We believe that the Trump administration's push for deregulation provides unique opportunities for federal agencies to take bold action to eliminate non-statutorily required regulations and directives, particularly those that duplicate existing oversight mechanisms. We sincerely hope that ACURO will take advantage of this moment to reexamine the Review Directive and adopt one or more of the options outlined above.

Should you have any questions regarding this letter, please contact me or Kristin West, COGR's Director of Research Ethics and Compliance at kwest@cogr.edu.

Sincerely,

Matt Owens
President