



June 21, 2018

The Honorable Deborah Stabenow
The Honorable Pat Roberts
Hart Senate Office Building
Washington, DC 20510
Attn: Kyle Varner, Ashley McKeon, Chelsie Keys, and Will Stafford

Dear Senators Stabenow and Roberts,

The Association of American Universities (AAU), Association of Public and Land-grant Universities (APLU), the Council on Governmental Relations (COGR), and the Association of American Medical Colleges (AAMC) write to offer our support for efforts to provide regulatory relief by allowing flexibility on the timing of research facilities inspections under the Animal Welfare Act (AWA).

Section 2034 of the 21st Century Cures Act, signed into law on December 13, 2016, directs federal agencies to “complete a review of applicable regulations and policies for the care and use of laboratory animals and make revisions, as appropriate, to reduce administrative burden on investigators while maintaining the integrity and credibility of research findings and protection of research animals.” On April 17, 2017, COGR, AAMC, the Federation of American Societies for Experimental Biology, and the National Association for Biomedical Research, convened a workshop on reforming animal research regulations with the goal of providing actionable recommendations for promoting regulatory efficiency, animal welfare, and sound science. Our ultimate goal is to ensure that the regulatory reforms enable facilities to more effectively provide care for and protect the welfare of the animals used in life-saving medical research.

The resulting [report](#), released in October 2017, recommends that Congress “amend §2146 of the AWA to remove the requirement for annual USDA inspection of research facilities and allow for an inspection frequency based on compliance history, as part of the agency’s Risk Based Inspection System process.” As noted in the report, “A comparison of the FY 2006 inspection results with those for FY 2016 show the number of citations with research facility-specific issues has declined by 87 percent. A review of FY 2016 citations also finds that 1.5 percent of facilities accounted for 30 percent of total citations, suggesting that a risk-based inspection process incorporating compliance history would significantly improve inspection process efficiency and overall compliance with the AWR.” Currently, research is the only sector for which the Animal Welfare Act requires annual inspections. AAU, APLU, COGR, and AAMC strongly support efforts to bring research into line with how the USDA handles inspections for all others, including dealers, exhibitors, intermediate handlers, and carriers. Such a change would reduce administrative burden on federally funded researchers while maintaining the protection of research animals in keeping with provisions of the 21st Century Cures Act.

Sincerely,

Mary Sue Coleman
President, AAU

Peter McPherson
President, APLU

Anthony P. DeCrappeo
President, COGR

Atul Grover
Executive Vice President, AAMC

The Association of American Universities is an association of 60 U.S. and two Canadian preeminent research universities organized to develop and implement effective national and institutional policies supporting research and scholarship, graduate and undergraduate education, and public service in research universities. The Association of Public and Land-grant Universities is a research, policy, and advocacy organization with a membership of 237 public research universities, land-grant

institutions, state university systems, and affiliated organizations in the U.S., Canada, and Mexico, that is dedicated to strengthening and advancing the work of public universities. The Council on Governmental Relations is an association of over 190 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member institutions. The Association of American Medical Colleges is dedicated to transforming health care through innovative medical education, cutting-edge patient care, and groundbreaking medical research. Its members comprise all 151 accredited U.S. and 17 accredited Canadian medical schools; nearly 400 major teaching hospitals and health systems; and more than 80 academic societies.