



May 15, 2018

The Honorable David Rouzer
U.S. House of Representatives
424 Cannon House Office Building
Washington, DC 20515
Attn: Jason Cooke

Dear Representative Rouzer,

The Association of American Universities (AAU), Association of Public and Land Grant Universities (APLU) and the Council on Government Relations (COGR) offer our thanks and support for the recently offered [amendment](#) to H.R. 2 which revises 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, the Federation of American Societies for Experimental Biology, the Association of American Medical Colleges, 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.

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.” The amendment offered is in line with this recommendation and would encourage risk-based inspection in order to more efficiently focus resources on problematic facilities. 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.” AAU, APLU, and COGR strongly support your amendment which would also bring research into line with how the USDA handles inspections for dealers, exhibitors, intermediate handlers, carriers, and others. Currently, research is the only industry required under the Animal Welfare Act to be inspected annually.

Thank you for your support of efforts to 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,

Handwritten signature of Mary Sue Coleman in black ink.

Mary Sue Coleman
President, AAU

Handwritten signature of Peter McPherson in black ink.

Peter McPherson
President, APLU

Handwritten signature of Anthony P. DeCrappeo in black ink.

Anthony P. DeCrappeo
President, COGR

The Association of American Universities (AAU) 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 (APLU) 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 (COGR) 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.