

April 8, 2002

Anthony Demsey, Ph.D.
Senior Advisor for Policy
Office of Extramural Research
National Institutes of Health
Building 1, Room 154
Bethesda, MD 20892

Reference: March 28 Federal Register Notice

Dear Dr. Demsey:

The Federation of American Societies for Experimental Biology (FASEB) strongly supports the proposed change in the PHS Policy on Humane Care and Treatment of Laboratory Animals announced in the Federal Register on March 28, 2002. We commend the National Institutes of Health (NIH) for its efforts to streamline and improve this important area of regulatory policy.

Acting on behalf of our 21 societies and their 60,000 members, FASEB's Public Affairs Executive Committee carefully reviewed the proposed change and endorsed it fully. The "just-in-time" review will give Institutional Animal Care and Use Committees (IACUCs) flexibility to focus their attention on those proposals likely to be funded. This will reduce the regulatory burden on both grant applicants and IACUCs. It will also enable IACUCs to devote more of their time and resources to funded projects, thereby improving animal welfare. The "just-in-time" concept has proven beneficial in the review of human subjects protocols, and its extension to animal research is fully justified.

Several years ago, NIH embarked on an ambitious effort to streamline regulations and reduce excess regulatory burdens. We applaud this most recent outcome of that initiative, and look forward to additional proposals.

Sincerely yours,

Robert R. Rich, M.D.
FASEB President