

# FASEB Letter Regarding Proposed Cost Analysis and Rate Setting Manual for Animal Research Facilities

developed by the NIH [National Center for Research Resources](#)

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June 5, 1997

Charles McPherson, D.V.M.  
Chairman, NIH Committee on Revision of  
Cost Analysis and Rate Setting Manual for  
Animal Research Facilities  
American College of Laboratory Animal Medicine  
Cary, North Carolina 27511

Dear Dr. McPherson:

I am writing on behalf of Federation of American Societies for Experimental Biology to comment on the *Draft Cost Analysis and Rate Setting Manual for Animal Research Facilities*. As you may know, FASEB is a federation of 14 scientific societies that represents the interests of more than 52,000 biomedical scientists. FASEB has a long-standing concern with the problem of indirect costs for animal care and we have presented our consensus policy positions to the National Center for Research Resources on previous occasions.

We wholeheartedly endorse your concept that animal research facilities are research facilities like other laboratories, which should be supported in the indirect facilities and administrative (F&A) category, as are more usual laboratory facilities. Categorizing animal research facilities as "specialized facilities" under the rules of Circular A-21 has proven unworkable.

FASEB holds that the purchase, daily husbandry, and research procedures involving animals should be direct charges to the investigator's grant. All other operational costs should be in the F&A category. In this regard, we do not believe the committee's draft manual goes far enough in that the costs of animal research facility administration and regular animal health care are not included in the indirect facilities and administrative category.

Another major principle adopted by FASEB is that procedures for assigning vivarium costs to indirect and direct cost categories should be consistent for the entire country, and that the rules governing vivarium costs be consistent and fair for all. FASEB finds that the proposed rate setting manual would make substantial progress in providing such consistency, and we strongly commend the committee for these efforts. By providing a common standard among institutions, the proposed rate setting manual

would assist NIH and its study sections in comparing costs and procedures specified by research proposals. Because the proposed draft rate setting manual would advance procedures for competitive review of research projects, FASEB supports adoption of this manual for Federally funded research.

FASEB strongly suggests that representatives of working scientists continue to be included in the deliberations involved in implementing the policies and procedures contained in the committee's report.

In closing, we thank your committee for their work and emphasize that FASEB is eager to support your efforts in forthcoming negotiations.

Sincerely,

John W. Suttie, PhD  
FASEB President