



June 5, 1998

Dr. Christian Newcomer  
Chair, Committee on Cost of and Payment for Animal Research  
Institute for Laboratory Animal Research  
2101 Constitution Avenue, NW  
Washington, DC 20418

Dear Dr. Newcomer:

Congratulations on achieving consensus on an issue that has been the subject of considerable controversy. We are particularly impressed with the clarity of vision articulated in *Approaches to Cost Recovery for Animal Research: Implications for Science, Animals, Research Competitiveness, and Regulatory Compliance*. Rather than reflecting a simple compromise among the committee members' initially quite disparate views, this report does an excellent job of situating this issue in the broader scientific and regulatory context, and developing its own incisive analysis.

The report's discussion of the evolution of animal-based research is right on the mark. We very much concur with your committee's emphasis on the importance of high quality animal care, and we believe that the report does a great service by explicating how centralized facilities enhance animal welfare and research quality. Accordingly, we could not agree more with the conclusion that "the ARF is now an integral part of the research program." Further, the report clearly explains the implication of this evolution in animal-based research: "The space used to breed, rear, exercise, and house animals according to their behavioral needs during the conduct of research is an integral part of an individual investigator's research space." In the end, the report does an excellent job of translating these developments in scientific practice into the language of cost recovery: The space in an animal facility is used to conduct research, as is space in any research laboratory. The cost of other laboratory space is included in the F&A cost pool, so it would be inconsistent to treat the cost of ARF space as direct costs in per diem rates.

Finally, we appreciate the report's emphasis on the need for consistency in treatment for the costs of animal care, regardless of whether animals are cared for in a centralized animal research facility or in disbursed laboratories. We agree that "the cost-recovery system should provide incentives, and should not provide disincentives, for high-quality animal research that meets all applicable federal and state safety and security regulations."

Once again, congratulations on an insightful report. FASEB applauds the subcommittee for their work, and we stand ready to offer you our assistance in communicating the report's essential message to policymakers.

Sincerely,

Ralph G. Yount, PhD  
President

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