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October 11, 2023

Office of Laboratory Animal Welfare (OLAW)
National Institutes of Health
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, MD 20892

**RE: Request for Information (RFI) on Flexibilities for Streamlining
IACUC Review of Protocols and Significant Changes ([NOT-OD-23-152](#))**

Submitted electronically via portal.

Dear Dr. Brown,

The American Society for Pharmacology and Experimental Therapeutics (ASPET) appreciates the opportunity to provide comments on the Request for Information regarding flexibilities for streamlining protocol review. ASPET is a 4,000-member scientific society whose members conduct basic and clinical pharmacological research and work in academia, government, industry, and non-profit organizations. ASPET members conduct research leading to the development of new medicines and therapeutic agents to fight existing and emerging diseases. ASPET is a global pharmacology community that advances the science of drugs and therapeutics to accelerate the discovery of cures for disease. We are in constant pursuit of our Mission through research, education, innovation, and advocacy.

Processes such as designated member review (DMR), DMR subsequent to full committee review (FCR), veterinary verification and consultation (VVC), and administrative handling of increases in previously approved animal numbers improve the efficiency of institutional animal care programs by decreasing turnaround times while maintaining policy compliance and high-quality animal care.

ASPET supports OLAW's work in the RFI by identifying and listing flexibilities that allow for IACUCs to streamline their processes. However, the listed flexibilities are not new or novel as many, if not all, are already utilized by many institutions and investigators. The RFI succeeds in drawing attention to the available flexibilities that IACUCs have. While this effort is appreciated, ASPET believes that drawing attention to the flexibilities and encouraging IACUCs to use them is not enough for streamlining the review of protocols as it fails to break new ground to reduce administrative burden nor provides a venue to solicit new ideas that could enhance the mission of IACUCS. ASPET fully supports OLAW in working to increase awareness to the available flexibilities but believes that to maximize the benefits and use of these flexibilities, OLAW may want to consider exploring additional opportunities that could help streamline protocol review and reduce administrative burden.

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We strongly encourage OLAW to work with its partners to encourage IACUCs to use these streamlining strategies through outreach and communicating OLAW's support of the use of the listed flexibilities.

Thank you for the opportunity to offer comments on ways to increase the use of flexibilities for streamlining IACUC review of protocols and significant changes.

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