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Elisa A. Hurley, PhD
Executive Director

Monday, June 21, 2021

Dr. Teresa J. Sylvina

Director, Institute for Laboratory Animal Research

Division on Earth and Life Studies

National Academies of Sciences, Engineering, and Medicine

500 Fifth Street, NW, K645

Washington, DC 20001

Via email: tsylvina@nas.edu

Dear Dr. Sylvina,

We appreciate the essential work of ILAR in developing the *Guide for the Care and Use of Laboratory Animals*, a foundational document for the work of the animal care and use community, and we are excited to hear that the process of revising the *Guide* has begun. Here we write in support of our colleagues in the laboratory animal veterinarian community in their call for a transparent and collaborative process for the development of the ninth edition of the *Guide*.

PRIM&R is a nonprofit organization dedicated to advancing the highest ethical standards in the conduct of research. Since 1974, PRIM&R has served as a professional home and trusted thought leader for the research protections community. Through educational programming, professional development opportunities, and public policy initiatives, PRIM&R seeks to ensure that all stakeholders in the research enterprise appreciate the central importance of ethics to the advancement of science.

We serve the laboratory animal research community, specifically, by providing professional and educational support to members and staff of Institutional Animal Care and Use Committees (IACUCs), laboratory animal veterinarians, and other research oversight professionals, in their critical work of ensuring the ethical care and use of research animals. The *Guide* is therefore central to the day-to-day work of our constituencies.

We are aware that colleagues from the American College of Laboratory Animal Medicine, the American Society for Laboratory Animal Practitioners, and the Association of Primate Veterinarians, in

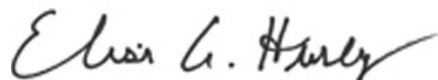
recent correspondence with your office, have requested that the process for updating the *Guide* be transparent and inclusive of community perspectives. We support their requests, specifically, that 1) the research community being given the opportunity to preview and comment on changes to the *Guide* prior to their finalization, and 2) potentially affected stakeholder institutions be surveyed regarding proposed changes to the *Guide* likely to have a significant economic impact.

It is critical that the perspective of veterinarians be included in the process of updating the *Guide* because of their familiarity with the literature regarding, and their everyday experience of, best practices in animal care and welfare, from husbandry to housing to medicine. Given the *Guide's* impact on laboratory animal care and use practices, the depth and breadth of the veterinarian community's experience is crucial to ensuring that the *Guide* represents the most current and thorough knowledge of this domain. More generally, when the policy drafting process is transparent, iterative, and responsive to the needs of its end users, it makes for better guidance. Stakeholder engagement creates the circumstances needed for stakeholder *buy-in*, wherein the guided community is supportive of the guidance and invested in its quality.

As an organization committed to promoting high-quality, ethical research with animals, PRIM&R is eager to support and contribute to a transparent and responsive process for revising the *Guide*, in any way that would be helpful. Please feel free to contact me at 617.999.4422 or ehurley@primr.org.

Thank you.

Sincerely,

A handwritten signature in black ink, reading "Elisa A. Hurley". The signature is written in a cursive, flowing style.

Elisa A. Hurley, PhD
Executive Director

cc: PRIM&R Public Policy Committee, PRIM&R Board of Directors