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October 20, 2023

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

Submitted via web portal

**RE: Request for Information (RFI) on an Update to the Current OLAW
Guidance Disclaimer (NOT-OD-23-157)**

Dear Dr. Brown,

The American Society for Pharmacology and Experimental Therapeutics (ASPET) appreciates the opportunity to provide comments on the Request for Information regarding the update to the current OLAW guidance disclaimer. 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.

ASPET appreciates OLAW for acknowledging that different interpretations of the language in guidance documents are possible and supports OLAW's proposal to review and update the guidance disclaimer. Variety in guidance document interpretations can lead to significant administrative burden for institutions, investigators, Institutional Animal Care and Use (IACUC) members, and animal care staff. Clarifying OLAW's intent in its guidance documents ensures that institutions retain the flexibility to use other strategies to comply with Public Law 99-158, Sec. 495 and Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy V.A.3.) requirements.

Thank you for the opportunity to offer comments on the update to the Current OLAW Guidance Disclaimer.

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