



ASSOCIATION OF
AMERICAN
MEDICAL COLLEGES

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July 31, 2003

National Institutes of Health
Office of Technology Transfer
NSC, 6001 Executive Blvd
Room 4263
Bethesda, MD 20892

Re: "Share-my-mouse," NOT-OD-03-043

Dear Sir/Madam:

I write on behalf of the Association of American Medical Colleges (AAMC) in response to the NIH Draft Statement on Sharing and Distributing Mouse Resources. The AAMC represents all 126 accredited U.S. medical colleges, over 400 teaching hospitals, and 94 academic medical societies. These institutions perform more than half of all extramural research sponsored by NIH. They have always been major users of experimental research animals, especially mice, and the intensity of that usage has been magnified many-fold by the advent of structural and functional genomics.

In brief, the AAMC agrees with the recommendations developed by the Federation of American Societies for Experimental Biology (FASEB) through its broad interactions with the investigator community. In particular, we concur with FASEB's observation that significant costs are incurred in sharing mouse resources that go well beyond those most easily identified in shipping between laboratories. These include some portion of the substantial infrastructure costs embedded in the budgets of research animal facilities, which are incurred in the creation, propagation, evaluation, and maintenance of stocks of fragile recombinant mice. It is well known that colonies of transgenic mice can be extremely susceptible to infection or contamination, and require levels of protection and care often compared to those of an Intensive Care Unit or hospital isolation facility.

We recognize that identifying and fairly allocating such costs attributable to sharing is not a simple task, but we believe that the odds of compliance with the "Share-my-mouse" program would be greatly enhanced if NIH oversaw the development of an equitable mechanism to accomplish that objective. We suggest that a useful first step would be to convene a working group of experienced investigators, research animal facility directors, and university business officers adept in research costing to propose one or more methodologies for further evaluation. Explicit guidance for recovering the appropriate full costs of mouse sharing would ensure better compliance with this policy.

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We note that NIH intends the statement on mouse sharing as an extension of its *Principles and Guidelines on Obtaining and Disseminating Research Resources* (or “Research Tools”), emphasizing, we believe, the especially important role of recombinant mice and other mouse resources in “post-genomic” research. The AAMC remains fully supportive of the NIH research tools policy, sharing the agency’s concern that encumbrances and restrictions on these resources both impede the growth *and* application of knowledge and weaken the very rationale for publicly funded biomedical research. A key question is how successful the research tools guidelines and the mouse sharing statement will be in influencing providers of tools that are developed with non-NIH funding. The AAMC hopes that the wisdom of these policies will be recognized and accepted across the biomedical research community.

In closing, let me emphasize that AAMC fully supports the “Share-my-mouse” initiative and offers its recommendations in order to strengthen the appeal of the initiative and the likelihood of its success.

Sincerely,

Jordan J. Cohen, M.D.