

July 22, 2026

Warren Casey, Ph.D., DABT
ICCVAM Executive Director
National Institute of Environmental Health Sciences
P.O. Box 12233

Re: Americans for Medical Progress Written Comments to ICCVAM Public Forum 2026

Dear Dr. Casey,

Americans for Medical Progress (AMP) appreciates the opportunity to provide written comments to the Interagency Coordinating Committee for the Validation of Alternative Methods (ICCVAM) Public Forum. As a national nonprofit organization, AMP supports the responsible use of animals in biomedical research when they remain necessary, as well as the thoughtful integration of New Approach Methodologies (NAMs) wherever they are scientifically appropriate, validated, and reliable.

The rapid expansion of new scientific tools and methods presents an opportunity to strengthen biomedical research, improve animal welfare, and give researchers more ways to answer complex questions. Maximizing that potential will require balanced, evidence-based policies that evaluate each method according to the question at hand and recognize that the strongest science may draw on NAMs, clinical data, animal studies, or a combination of approaches.

AMP welcomes the establishment of the Office of Research Innovation, Validation, and Application (ORIVA) and recognizes the important role the new office can play in shaping the future of biomedical research. To support this work, AMP offers three recommendations that focus specifically on how ICCVAM can facilitate ORIVA's mission and intended goals.

1. Measure progress by scientific impact. Although AMP recognizes ORIVA's goal of reducing funding for animal studies while increasing investments in human-based approaches—and shares NIH's commitment to reducing unnecessary animal use—changes in funding levels or publicly reported spending totals are not, by themselves, evidence of scientific progress. AMP therefore encourages NIH, ICCVAM, and ORIVA to assess success through measures such as rigor, reproducibility, predictive value, mechanistic insight, regulatory utility, and patient benefit. Funding totals and overall animal-use numbers may be easy to track, but they do not show whether a method produces better science or improves patient outcomes.

2. Protect and strategically invest in essential infrastructure. NIH policy must support the infrastructure needed for both emerging human-based approaches and responsible animal research. AMP appreciates ORIVA's intent to expand the facilities, technologies, and resources that can accelerate the development and use of NAMs, but those investments should not come at the expense of essential existing capabilities. Facilities, breeding resources, veterinary expertise, skilled personnel, biological samples, and high-quality reference data are closely connected, and developing and validating NAMs



often depends on comparative evidence and expertise drawn from both animal and human biology. Because specialized research resources, including the National Primate Research Centers, take years to establish and may be difficult or impossible to recreate once lost, infrastructure decisions must account for the needs of the full research ecosystem.

3. Maintain method-neutral grant review, training, and agency communication. Scientific approaches are best evaluated according to their suitability for the research question, the strength of their justification, and the quality of the evidence they are expected to produce. This standard applies equally to NAMs, animal studies, human data, and integrated approaches. As NIH and ORIVA develop bias-mitigation training and related policies, AMP strongly recommends engaging and collecting input from researchers, veterinarians, IACUC professionals, patient groups, industry, and method developers to ensure that implementation supports open scientific inquiry without introducing new preferences or disincentives based solely on the category of method proposed.

Conclusion

Lasting biomedical progress depends on collaboration, scientific innovation, and sustained investment in the full range of tools and capabilities needed to fulfill NIH's mission. The research community, including scientists and professionals who work with animals, must be included as a full partner in this next phase.

As ICCVAM assumes a broader role within ORIVA, AMP encourages NIH to continue leveraging its role as a neutral convener across agencies and research communities. A balanced, evidence-based strategy can expand the scientific toolkit, improve animal welfare, preserve essential capabilities, and support rigorous, humane, and reproducible research that advances human and animal health.