Supporting Statement A for

Chimpanzee Research Use Form - OD

OMB Control Number: 0925-0705

Expires: July 31, 2026

Office of Laboratory Animal Welfare (OLAW)

Office of the Director (OD)

National Institutes of Health (NIH)

Date: 04/23/2026

Check off which applies:

- ☐ New
- ☐ Revision
- ☐ Reinstatement with Change
- ☐ Reinstatement without Change
- **X Extension**
- ☐ Emergency
- ☐ Existing

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- Attachment 10: Chimpanzee Research Use Form (0925-0705)
- Attachment 11: Applicability of the Privacy Act: Chimpanzee Research Use Form

A. Justification

Abstract: The National Institutes of Health (NIH) requests to extend the Chimpanzee Research Use Form (OMB Control No. 0925-0705). The purpose of this form is to obtain information needed by the NIH to assess whether the proposed research satisfies the agency policy for research involving chimpanzees. The NIH considers the information submitted through this form prior to the agency making funding decisions or otherwise allowing the research to begin. Completion of this form is a mandatory step toward receiving NIH support or approval for research involving chimpanzees. This is an extension of a previously approved submission.

A.1 Circumstances Making the Collection of Information Necessary

In 2010, NIH commissioned a study by the IOM to assess whether chimpanzees are or will be necessary for biomedical and behavioral research. The IOM issued its findings (**Attachment 1**), with a primary recommendation that the use of chimpanzees in research be guided by a set of principles and criteria. Based on its deliberations, the IOM committee concluded that "while the chimpanzee has been a valuable animal model in past research, most current use of chimpanzees for biomedical research is unnecessary." The committee also concluded, however, that certain areas of science may continue to require the use of chimpanzees. While the committee encouraged NIH to continue development of non-chimpanzee models and technologies, it acknowledged that new, emerging, or re-emerging diseases may present challenges that may require the use of chimpanzees. After careful consideration, the NIH Director, Francis S. Collins, M.D., Ph.D., accepted the IOM committee recommendations and decided not to fund new research involving chimpanzees until the NIH considered and issued policy implementing the IOM recommendations (**Attachment 2**). To advise the agency in formulating its policy, the NIH established the Council of Councils Working Group on the Use of Chimpanzees in NIH-Supported Research in 2012. In January 2013, the Working Group presented its recommendations to the NIH Council of Councils, which accepted the Working Group's report (**Attachment 3**) and recommended that NIH accept them as well. After considering public comments on the Council report, the NIH accepted (**Attachment 4**) most of their recommendations in June 2013. Among other things, the agency accepted the Council recommendation to establish a panel, which is independent of the existing NIH review processes such as peer review of grants, technical evaluation of contracts, scientific review of NIH intramural research, and agency review of privately supported (or 3rd party) projects (**Attachment 5**). The panel considered whether requests to the NIH to use chimpanzees in research are consistent with the IOM principles and criteria. A working group of the NIH Council of Councils, the Chimpanzee Research Use Panel (CRUP), was created and charged with considering requests to the agency to use chimpanzees in research. To fulfill its charge, the CRUP needed information consistent with an information collection on how investigators proposed to used chimpanzees in research. The NIH used the Chimpanzee Research Use Form (OMB control number 0925-0705) to collect the relevant information.

In November 2015, the NIH announced (**Attachment 6**) that the agency would no longer support a colony of chimpanzees for future research due to reduced demand and the U.S. Fish and Wildlife Service designated captive chimpanzees as endangered (**Attachment 7**). Further, in February 2016, the agency announced that it would support only "noninvasive" research involving chimpanzees (**Attachment 8**). This announcement prompted a revision to and simplification of the Chimpanzee Research Use Form (control 0925-0705), which OMB approved. In June 2025, changes to the process of submitting and review of the Chimpanzee Research Use Form occurred due to the decommissioning of the previously used system

(Attachment 9). To reflect the changes to the process, the Chimpanzee Research Use Form (control 0925-0705) was revised, submitted as a nonsubstantive change, and obtained OMB approval in July 2025 **(Attachment 10)**. No further changes have been made to the form since the last OMB approval, although the number of respondents has increased. We propose only minor edits to update cost estimates. The legislative authority that makes the collection of this information necessary is Title 42, Chapter 6A, Subchapter II, Part A, Section 241 – Research and investigations generally.

A.2 Purpose and Use of the Information Collection

The purpose of this form is to obtain information needed by the National Institutes of Health (NIH) to assess whether the proposed research satisfies the agency policy for research involving chimpanzees (**Attachment 8**). The NIH considers the information submitted through this form prior to the agency making funding decisions or otherwise allowing the research to begin. Completion of this form is a mandatory step toward receiving NIH support or approval for research involving chimpanzees.

Research undertaken in the last 3 years under 0925-0705 met NIH's determination of "non-invasive." More specifically, research involved: 1) live animal activities that were purely observational of animals in the wild; 2) observational of behavioral procedures performed with willing subjects in a sanctuary or other captive setting; 3) the use of specimens collected during routine veterinary exams or necropsy, archived samples, or biosamples left in the environment and collected after animals have left the area; or the use of commercially available cell lines.

A.3 Use of Information Technology and Burden Reduction

Most applicants complete and submit the Chimpanzee Research Use Form and upload the form to the Electronic Research Administration (eRA) grants management system. The agency decided to use this means of collection to assure security of potentially proprietary and sensitive information, improve data quality, reduce collection burden, and improve agency efficiency and responsiveness over paper-based submission. For applications that are not processed in the Electronic Research Administration grants management system, such as for contracts, individuals submit the Chimpanzee Research Use form via email which is an efficient and economical method that permits timely transmission.

A.4 Efforts to Identify Duplication and Use of Similar Information

There is no similar information collected from applicants or offerors.

A.5 Impact on Small Businesses or Other Small Entities

No small businesses will be involved.

A.6 Consequences of Collecting the Information Less Frequently

The information is collected once per applicant/offeror. If the collection does not occur, the NIH will not be

able to assess if the grant applicant, intramural researcher, contract offeror, or 3rd party researcher has addressed the NIH policy. Once an NIH funding institute or center decides it is likely to fund a project involving chimpanzees, the agency asks the Principal Investigator to complete the Chimpanzee Research Use form so the NIH has the necessary information to conduct its evaluation.

A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances.

A.8.1 Comments in Response to the Federal Register Notice

This proposed information collection was previously published in the Federal Register on February 19, 2026 (91 FR 8014) and allowed 60 days for public comment. The NIH received no requests to view the form and no comments expressing any opinion about the proposed collection.

A.8.2 Efforts to Consult Outside Agency

No Federal agency outside of the NIH has been consulted on the form due to the NIH-specific nature of the collection requirement.

A.9 Explanation of Any Payment of Gift to Respondents

Respondents will not receive payment and/or gifts for completing the form.

A.10 Assurance of Confidentiality Provided to Respondents

Respondents are provided with assurance that NIH staff and contractors are bound by confidentiality agreements. Per the NIH Privacy Act Officer **(Attachment 11)**, a Privacy Impact Assessment is not required because no Personally Identifiable Information (PII) is collected and retrieved by unique ID. However, contact information including organizational affiliation (address, name, unique entity identifier (ID)), signing official information (name, phone, email), principal investigator name, project information (title and number), and funding mechanism may be collected and is transferred into a Privacy Act System of Records, eRA. eRA maintains its own System of Records Notice (09-25-0225, NIH eRA).

A.11 Justification for Sensitive Questions

None of the information collected is of a sensitive nature.

A.12.1 Estimates of Hour Burden Including Annualized Hourly Costs

The research community will be the respondents to this form. Up to 30 respondents will be asked to

complete the form per year. The frequency of the data collection will be once per application for funding or proposal for contract award (competitive renewals usually occur every 3-5 years) and the respondent should take no more than 30 minutes to complete the form. The form was tested and reviewed by less than 9 NIH researchers to obtain this estimate. For grant applicants (including cooperative agreements) and Other Transactions, some portions of the form are not required, further reducing the hourly burden for this respondents.

Table 12-1 Estimated Annualized Burden Hours

Form Name	Type of Respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Per Response (in hours)	Total Annual Burden Hours
Chimpanzee Research Use Form	Research Community	30	1	30/60	15
TOTAL			30		15

A.12-2 Annual Cost to Respondent

The total cost to the respondents is $1,644.30. The wage rate of $109.62 used below matches the salary limitation for NIH grants per NIH Guide Notice NOT-OD-26-034*. That notice provides the salary limitation for NIH grant and cooperative agreement awards and extramural research and development contract awards. The notice sets the maximum annual salary at $228,000. To get the hourly rate we divided $228,000 by 2080 hours per year then rounded to the nearest penny to get the result of $109.62.

Table 12-2 Annualized Cost to Respondents

Type of Respondents	Total Annual Burden Hours	Hourly Respondent Wage Rate*	Respondent Cost
Scientific Researcher	15	$109.62	$1,644.30
TOTAL			$1,644.30

*Wage rate used matches the salary limitation for NIH grants per NIH Guide Notice NOT-OD-26-034 based on 2080 hours, https://grants.nih.gov/grants/guide/notice-files/NOT-OD-26-034.html

A.13 Estimate of Other Total Annual Cost Burden to Respondents or Record Keepers

The respondents will not incur any additional costs for providing this information.

A.14 Annualized Cost to the Federal Government

The Annual Cost to the Federal Government is $11,392. The method to estimate costs is to calculate the percent effort for the Office of Laboratory Animal Welfare staff involved in the data collection and then calculate the annual labor costs associated with that effort.

Cost Descriptions	Grade/Step	Salary* ($)	% of Effort	Total Cost ($) to Government
Federal Oversight				
Acting Director, OLAW	15/10	$197,200	1%	$1,972
Veterinary Medical Officer	15/7	$197,200	1%	$1,972
Veterinary Medical Officer	15/6	$197,200	1%	$1,972
Veterinary Medical Officer	13/10	$158,322	1%	$1,583
Program Analyst	13/4	$133,964	1%	$1,339
Program Analyst	11/7	$102,540	1%	$1,025
Program Analyst	9/5	$80,041	1%	$800
Program Analyst	9/2	$72,977	1%	$729
Other				0
Total				**$11,392**

*the Salary in table above is cited from
https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/DCB.pdf

A.15 Explanation for Program Changes or Adjustments

This extension constitutes an adjustment which increased the number of respondents from 20 respondents to 30 respondents.

A.16 Plans for Tabulation and Publication and Project Time Schedule

There are no plans for statistical analyses in publications and the data received from the respondents will not be published. In addition, CRU form reviews are anticipated throughout the year.

A.17 Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable to this request.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable to this request.