

September 18, 2025

Althea Grant-Lenzy, PhD
Acting Director of the Office of Science and CDC Chief Science Officer.
Center for Disease Control and Prevention
1600 Clifton Rd, NE
Atlanta, GA 30333

Dear RDML Grant-Lenzy,

On behalf of the American Psychiatric Association and the American Psychological Association Services, Inc., we are writing to request an edit and clarification to the Centers for Disease Control's (CDC) 6th edition of the Biosafety in Microbiological and Biomedical Laboratories (BMBL) guideline manual. The groups signed below are national organizations representing people with mental health conditions and substance use disorders and their family members, mental health and addiction providers, advocates, and other stakeholders that urge you to balance health and safety of laboratory environments and disability rights thereby ensuring inclusion in the scientific workforce.

Specifically, we recommend an amendment to Sections IV and V, which discuss biosafety level (BSL) criteria in all BSL labs and Animal Facilities. The current guidance states, "Animals and plants not associated with the work being performed are not permitted in the laboratory."¹ This leaves no room for objective assessment for equal or equitable access and opportunities for those with disabilities who utilize a service dog. This clause has created considerable barriers for service dog users to enter careers, such as medicine, with prerequisite or required courses in a laboratory setting. This has a major impact for individuals with psychiatric conditions who require the use of trained service animals (e.g., veterans with PTSD, individuals with anxiety disorders or obsessive-compulsive disorder), who are precluded from a wide range of educational and career opportunities because of this clause. These individuals are then further restricted from a multitude of employment opportunities that include, but are not exclusive to, those that involve laboratory activities.

This update and clarification can help inform what many see as a lack of understanding and application of the Americans with Disability Act as it relates to service dogs in the laboratory setting. We believe a suitable solution would be to amend the current BMBL guidelines to state, "**Animals and plants not associated with the work being performed are not permitted in the laboratory; service dogs may be an exception based on an individualized risk assessment.**"

We welcome the opportunity to collaborate with the CDC on this much needed change and clarification to the guidance, which has negatively impacted individuals with disabilities who are already underrepresented in medicine as well as other science, technology, engineering, and mathematics (STEM) occupations. Please do not hesitate to reach out for further clarification or discussion of any of our comments by contacting Brooke Trainum, Senior Director Practice Policy, at btrainum@psych.org.

Sincerely,

American Psychiatric Association
American Psychological Association Services, Inc.

¹ Biosafety Level 1 (pg 32, 35), A. Standard Microbiological Practices; Biosafety Level 2 (pg 37, 40); Biosafety Level 3 (pg 43, 46); Biosafety Level 4 (pg 51, 55); Animal Biosafety, Level 1(pg 76); Animal Biosafety, Level 2 (pg 82); Animal Biosafety, Level 3 (pg 91); Animal Biosafety, Level 4 (pg 102)