

If the amendment is approved as submitted, the IACUC along with the IACUC office must include it in the semiannual report to the Institutional Official listing all the IACUC-approved deviations from the *Guide* and the reason for each departure. Cooley's lab must be designated as a new animal facility and requires IACUC inspection as it will house USDA-covered species for up to 4 days, which exceeds both the 12-hour limit given in the AWA (§1.1)^{2,3} and the 24-hour limit given in the Public Health Service *Policy on Humane Care and Use of Laboratory Animals* 23:20; 25:1^{3,4}.

We concur with the designated member reviewer that the proposed changes were more for convenience than for scientific necessity. Blanket, program-wide departures from the recommendations of the *Guide* for reasons of convenience, cost or other non-animal welfare considerations are not acceptable.

The IACUC must disapprove the amendment. The IACUC can instead recommend that Cooley add more staff, make arrangements with the animal facility supervisor to use a room in the facility to process the samples, or move the animals to her lab during the collection of fluid samples but return them to their home cages in between collection cycles.

1. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* 8th edn. (National Academies Press, Washington, DC, 2011).
2. Animal Welfare Act and Regulations. Code of Federal Regulations. Title 9, Chapter 1. Section 3.28 (c)(3).
3. Silverman, J., Suckow, M.A. & Murthy, S. *The IACUC Handbook* 2nd edn. 430 (CRC Press, Boca Raton, FL, 2007).
4. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* Section IV.A.3. (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).

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RESPONSE

Inappropriate animal housing

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The animal facility environment must provide for the health, safety, comfort and wellbeing of the animals no matter where it is located. Housing hamsters (a USDA-covered species) outside of the Great Eastern University animal facility undoubtedly would entail the creation of a satellite animal facility, in accordance with the Public Health Service *Policy on Humane Care and Use of Laboratory Animals*¹ and the USDA Animal Welfare Act and Regulations².

Although an IACUC preliminary inspection of the area identified no potential regulatory problems, satellite facilities should provide appropriate functional space and environmental conditions to maintain optimum health and regulatory compliance.

Animal facility environmental specifications are constant, whereas external laboratory and teaching spaces are often on energy conservation programs and set environmental parameters at levels similar to the conditions stated in the scenario. Reduced air flow rate in a shared laboratory space could result in air stagnation, cage gas build-up and disease. The floor-to-ceiling light-proof curtain provides no guarantee against disturbance in circadian rhythm, and there is no indication of what other procedures are ongoing in the shared laboratory space. Nearby chemical reactions could negatively affect the wellbeing of the animals, as there is no indication that the box has filters built into the ventilation system to protect the animals from noxious fumes. In addition, noise and vibrations from laboratory

equipment and additional people in the laboratory could affect the animals.

One piece of information that the IACUC needs is the justification for moving the animals. The IACUC should determine whether the necessary equipment could be housed within the animal facility or whether accommodations for sample preparation prior to freezing are available within the animal facility. Either of these options would allow Cooley more research time and less travel time.

Cooley has also requested single housing for the three hamsters. Single housing of animals specific to experimental reasons is an established exception to the housing recommendations in the *Guide for the Care and Use of Laboratory Animals* (the *Guide*)³. The IACUC can approve this housing for scientific purposes but it does not have to be reported to the Institutional Official in the semiannual report.

Finally, there is no discussion of environmental monitoring that could raise an alarm if the environmental parameters in the box exceed those found in the *Guide*. With no monitoring or alarm system, temperature, air flow or other environmental parameters could reach unacceptable levels and could result in animal morbidity and mortality.

1. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* Section IV.B.1-8. (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
2. Animal Welfare Act and Regulations. 9 CFR, Chapter 1, Subchapter A, Subpart C, Section 2.31.
3. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* 8th edn. (National Academies Press, Washington, DC, 2011).

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