

- Silverman, J., Suckow, M.A. & Murthy, S. *The IACUC Handbook* 3rd edn. (CRC Press, Boca Raton, FL, 2014).

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RESPONSE

Recipe for disaster

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Cornish's new policy is a recipe for disaster. Both the Animal Welfare Act and Regulations¹ and the Public Health Service *Policy on Humane Care and Use of Laboratory Animals*² require that IACUCs maintain meeting records that include committee deliberations. This requirement is further reiterated in the *Guide for Care and Use of Laboratory Animals*³. The US Department of Agriculture, the Association for Assessment and Accreditation of Laboratory Animal Care International and potentially the Office of Laboratory Animal Welfare use the IACUC's meeting minutes to gauge the level of engagement by the committee and to determine how the IACUC responds to issues brought before it. Therefore, the minutes should clearly

reflect the deliberations of the committee. Regulatory bodies could misconstrue the new policy as an attempt to hide important information, which could lead to increased scrutiny by regulators.

Cornish is overstepping the bounds of his duties as chairperson with the proposal of his new policy. Not only does this policy give him authority that is not specified in any of the regulations, but it also has the potential to take a voice away from committee members who have opinions that differ from those of the chairperson or the majority.

Because the regulations do not specifically require approval of the minutes, institutions use best practices to guide procedures in this regard. A common best practice includes review and approval of the previous meeting's minutes by the full committee. This includes any changes to the minutes, as well as a report of redacted or corrected information reported to the committee. Many institutions redact identifying information from IACUC minutes, but in an effort to remain transparent, the minutes should still be reviewed and approved by a majority of the members that attended the meeting.

In this instance, Great Eastern University approved Cornish's new policy. But the policy should be revised to put specific limitations on what the chairperson is allowed to change or redact (e.g., researchers' names or protocol numbers). Additionally, this policy should be revised to require review and approval of the minutes by

the full IACUC to ensure that Cornish is complying with the revised policy and that Great Eastern University is meeting the regulatory requirements for record-keeping.

As a last resort, the Institutional Official (IO) should be made aware of Cornish's actions and the potential consequences of those actions. Each IACUC and administrative staff member should have a direct line of communication to the IO. The committee member who was opposed to Cornish's policy should submit a minority view with the semi-annual report to the IO as well. Each member is entitled to his or her opinion, and use of the minority view allows each member an opportunity to have that opinion heard. This can be a very effective tool for preventing Cornish from controlling the committee, as minority views must be included in the report to the IO and are accessible to the regulatory bodies^{2,3}.

- Animal Welfare Act Regulations. 9 CFR. Part 2, Subpart C.
- Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* IV, E, 1, b (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
- Institution 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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