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## An IACUC Chair who isn't a member

Pleasant Gorge College, a small school with big ambitions, was in the process of writing its first research grant requesting Public Health Service (PHS) funding for a project in the college's Department of Biological Sciences that would use common laboratory mice. Although Biological Sciences had a growing research program, the other departments of the school remained focused on teaching, and very few faculty members or administrators were interested in serving on its IACUC. Nevertheless, an IACUC and an approved Assurance were required by the NIH's Office of Laboratory Animal Welfare (OLAW), a part of the PHS, before any PHS financial support could be granted. Eventually, a consulting laboratory

animal veterinarian was employed and appropriate animal housing space was developed. A properly constituted IACUC also was recruited but not without some arm twisting by the school's academic dean. Then another problem arose: none of the IACUC members wanted to be the chairperson of the new committee, claiming that they already had far too much teaching and administrative work to take on another time-consuming responsibility. Frustrated and not wanting to further alienate the faculty, the dean asked the consulting veterinarian if it would be legal and acceptable to OLAW to have a properly constituted IACUC with five voting members but a chairperson who was not a member of the IACUC and did not have

a vote. The veterinarian responded that he had never heard of such an arrangement but, as far as he knew, it would be legal and potentially acceptable to OLAW. With that information, the president of the college appointed the dean as the chairperson of the IACUC.

The dean was pleased with the outcome as she believed that serving as Chair, even if it were for a limited time period, would give her first-hand insights into the operations of the IACUC, experience that would be beneficial as she led the school to further PHS funding opportunities. But do you think that the veterinarian's advice was correct? Can the dean of the school function as the Chair of the IACUC without being an IACUC member and without a vote?

### RESPONSE

#### Chair should be a voting member

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The consulting veterinarian is technically correct in that neither the Public Health Service (PHS) *Policy on Humane Care and Use of Laboratory Animals*<sup>1</sup> nor the *Guide for the Care and Use of Laboratory Animals*<sup>2</sup> requires that the IACUC Chair be a voting member of the IACUC. The Animal Welfare Act and Regulations<sup>3</sup> do require that the committee include the Chair, but that requirement would not be applicable unless the research program expanded to include USDA-covered species in addition to the "common laboratory mice" that it currently uses. In any case, the role of the IACUC Chair is vitally important to the success of the committee. The respect of the research community for the Chair, and the IACUC, could be severely diminished if the Chair is not a voting member and does not have a voice in committee decisions.

The IACUC Chair is the spokesperson of the IACUC to the Institutional Official (IO) and the research community. The committee members are generally shielded from public view, whereas the Chair is the visible representative. Since the dean would not be a member, she would not review protocols, determine policies, implement regulations or ensure humane animal care and use, but as Chair, she would need to defend all of the IACUC's decisions to the appropriate stakeholders. That puts the dean into a situation where she, as the leader, would take full responsibility for the IACUC's decisions without having a role in the decision-making process. Her credibility and leadership could be severely damaged in that type of politically precarious position.

The Chair is also responsible for supporting the IACUC members and communicating their needs to the IO. Without serving as a voting member, the dean would not have a clear understanding of the needs of the committee. Serving on an IACUC and bearing the full weight of the responsibility to both the animals and the researchers are necessary to completely understand the challenge of balancing the critical needs of both. Since the dean would

not have that responsibility, she might have a difficult time accurately communicating the IACUC's needs to the upper administration and could lose the respect of the IACUC members. To make matters worse, the IACUC was properly constituted only by the dean pressuring some to serve. With the dean being appointed the Chair without taking on the duties and responsibilities of the voting members, her authority with those on the committee is tenuous at best.

If the dean is truly interested in understanding how an IACUC functions and is looking for future PHS funding opportunities for Pleasant Gorge College, she should serve as a voting member of the IACUC and as the IACUC Chair.

1. 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).
2. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* 8th edn. (National Academies Press, Washington, DC, 2011).
3. Animal Welfare Act and Regulations. Code of Federal Regulations. Title 9. Section 2.31.a,b 1-3.

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