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Animal care and use programs for multiple campuses

Great Eastern University had one IACUC serving all four of its campuses. There were four attending veterinarians (one for each campus), but only one of them served on the IACUC as the university's attending veterinarian (AV). At first the veterinarians were skeptical about having only one IACUC for four campuses, but over time they recognized some unforeseen value to the arrangement because animal care and use policies and procedures had become more standardized across the campuses. Great Eastern also had four Vice Provosts for Research (one for each campus), but only one served as the university's Institutional Official (IO).

The multiple campuses and animal facilities were becoming a logistical problem. Over time, the Vice Provosts became progressively more uncomfortable with having only one of them wielding the authority to allocate resources that were needed for the animal care and use programs across the campuses. Even with collegial agreements in place, the arrangement gave the IO some *de facto*

authority to allocate funds from another Vice Provost's budget to assure compliance with federal animal care and use regulations. There was no outward animosity, just a desire of the Vice Provosts who were not the IO to have greater authority for the research on their campuses. Eventually, they agreed that because each campus had its own unique personality and research program, each campus should have its own IO.

They asked the IACUC's AV and the IACUC Chair for their opinions on whether there could be more than one IO for the university if each IO had a clearly defined area of responsibility. The AV replied that the US Department of Agriculture (USDA) and the US National Institutes of Health's Office of Laboratory Welfare (NIH/OLAW) had stated that because the size and complexity of institutions vary, no single organizational or administrative structure was compatible with the needs of all institutions¹. It seemed logical to him that if an institution could have multiple AVs, then it should be able to have multiple IOs. The IACUC Chair wasn't as sure. She said that if there would be one

IO for each campus who performed all of the functions of an IO specified in the Public Health Service *Policy on Humane Care and Use of Laboratory Animals*² and the Animal Welfare Act regulations³, then the plan might work. If, however, there would be four IOs, each having only partial authority for what an IO must do (e.g., finances, personnel, infrastructure and research compliance responsibilities) that would, in her opinion, never work or be acceptable to the federal agencies.

What is your opinion? Can there be more than one IO at Great Eastern University? If so, how would you structure their responsibilities to satisfy NIH/OLAW and USDA?

1. Brown, P. & Gipson, C. A word from OLAW and USDA. *Lab Anim. (NY)* **38**, 113 (2009).
2. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
3. Animal Welfare Act and Animal Welfare Regulations. Part 2, Subpart C. Research Facilities.

RESPONSE

Separate institutions

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It is understandable that the Vice Provosts for Research (VPRs) of the four Great Eastern campuses want the authority as Institutional Officials (IOs) to allocate resources as they see fit for their individual programs rather than allowing a single IO to represent all campuses. Having one IO per campus can work well as long as each campus maintains a separate Animal Welfare Assurance, registration with the US Department of Agriculture (USDA) and accreditation with the Association for Assessment and Accreditation of

Laboratory Animal Care International (as applicable to their programs).

The real question, then, may be what acceptably counts as an institution requiring an Assurance or USDA registration, noting that the Public Health Service *Policy for the Humane Care and Use of Laboratory Animals*¹ and Animal Welfare Act² offer institutions wide latitude to define and organize themselves. The regulations do not preclude one individual from serving as chief executive officer (CEO) or IO of multiple institutions or prohibit a single campus from being divided into multiple Assured or registered entities, so long as all activities requiring institutional oversight are, in fact, overseen. Designating the four Great Eastern campuses as separate institutions will allow greater local control of their individual programs.

As an example, the University of California (UC) system has ten campuses, each with a stand-alone animal program including an attending veterinarian (AV) and an IACUC that reports to the VPR or IO at that campus. On a regular basis, the UC Office of the President gathers the IOs, AVs and IACUC administrators to discuss common issues. They share best practices and counsel each other on challenging situations, but ultimately, each campus is responsible for its own activities. This works well for UC given the scale of the overall program.

In this scenario, Great Eastern's IACUC Chair was concerned that assigning a defined area of responsibility to each IO would imply that each has only partial authority for what an IO must do. Designating an IO as singly responsible for the personnel, facilities,