

or significant. Minor deficiencies are, by definition, generally associated with lower risk, so some flexibility in the timetable for correction is appropriate. In contrast, a significant deficiency is one that the IACUC and Institutional Official (IO) judge to present a threat or potential threat to the health or safety of the animals and, therefore, must be addressed as soon as possible, commensurate with the risks involved. It is essential for the IACUC to work with other professionals (occupational health and safety staff, engineering staff, veterinarians, etc.) as needed to gain a full understanding of the problem, the specific actions required to fully resolve the problem, the estimated costs involved, any appropriate interim (stop gap) measures necessary and a specific work plan for implementing the comprehensive response. The responsibility of the IACUC is to evaluate the body of information collected and to decide on a feasible plan and schedule of correction that appropriately safeguards the well-being of the animals and personnel. The IO is then responsible for ensuring that funds and other resources are allocated as needed to correct the significant deficiency according to the IACUC approved plan and schedule. If the institution fails to do this, then the IO is required to inform the USDA Animal and Plant Health Inspection Service within 15 business days. Typically, a report would also be prepared for the Office for Laboratory Animal Welfare (if the institution holds a PHS Assurance), and

other agencies might also have to be informed.

This scenario also raises a more general concern about the functioning of this IACUC. The difficulty of getting the inspection subcommittees to submit their findings for full committee consideration, and the tone of the interactions described, both suggest inadequate leadership of the committee. Covelli, the IACUC chair, appears more interested in avoiding responsibility than in leading the committee to provide appropriate oversight of the animal care and use program. The IACUC chair has the responsibility to appoint subcommittee members with a good understanding of the regulations (which requires that the chair also be familiar with the regulations), as well as to provide clear direction on preparing and submitting their findings to the full committee.

1. Animal Welfare Act Regulations. 9 CFR. Chapter 1, Subchapter A, Part 2, Subpart C—Research Facilities.
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. ARENA/OLAW, Institutional Animal Care and Use Committee Guidebook, 2nd ed., 2002.
4. 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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## RESPONSE

### Cooperation and IACUC approval

**Chrystal L. Redding, MS, RLATG**

The IACUC is responsible for both semiannual inspections and the program review and for ensuring that each of these contains a reasonable schedule for correcting deficiencies<sup>1,2</sup>. The committee should also be responsible for approving a schedule for correcting any deficiency after inspections or review. In most cases, a standard timeline could be set for minor deficiencies. The IACUC coordinator, facility manager or animal care staff representatives should work together with the IACUC to set a standard timeline for corrections. In situations that may require more time, it is reasonable to request input from the parties involved. Cooperation and communication between all parties involved creates a better understanding of how and when a deficiency will be corrected. The timelines should be reasonable and should be approved by the IACUC.

1. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* IV, B, 3 (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
2. Animal Welfare Act Regulations. 9 CFR. 1.31, c, 3.

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