

policy is in keeping with existing IACUC policies and the PHS *Policy* and was not made solely by the IACUC chairperson and attending veterinarian, but by a fully convened IACUC, it upholds the intention of the law. It will be the IACUC manager's responsibility to ensure that the assigned presenter or reviewers are able to complete the review. Committee membership changes, investigators are busy and people take time off, sometimes for extended periods. The biggest problem with this policy would be a delay in approval resulting from the lack of a reviewer.

1. National Institutes of Health. Guidance on significant changes to animal activities. Notice NOT-OD-14-126. (National Institutes of Health, Washington, DC, 26 August 2014).
2. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals IV, C, 2* (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).

Benz is Veterinary Medical Unit Supervisor at VA Western New York Healthcare System, Buffalo, NY.

RESPONSE

Laws should reflect reality

Alison D. Pohl, MS, rLATg, CPIA & Marisa Evans, CVT, LATg, CPIA

Great Eastern's IACUC should be commended for trying to establish a policy that saves time and meets the spirit of the laws governing the use of research animals. The policy might seem like a reasonable

solution, but in our experience, it would not be acceptable because the reviewers for each modification to be reviewed by designated members (notwithstanding that they would be the same individuals who reviewed the original protocol) were not assigned by the IACUC chairperson.

Both the Animal Welfare Act regulations¹ and the Public Health Service *Policy on Humane Care and Use of Laboratory Animals*² (PHS *Policy*) require that the IACUC chairperson assign the reviewers for designated member review (DMR) of protocol modifications. In considering Great Eastern's dilemma, however, we wondered whether it might be time to revisit this requirement.

Many research institutions do not have a dedicated IACUC chairperson. Instead, most IACUC chairpersons are individuals with multiple demands on their time. Many are investigators themselves responsible for their own laboratories. Depending on the type of institution in which they work, they may also have responsibilities with regard to teaching, multiple committee responsibilities, required participation in National Institutes of Health study sections and clinical responsibilities. Waiting for a response from an IACUC chairperson could waste precious time.

The research community needs to consider whether the research environment is the same now as it was when the laws were first passed. We suggest that things have changed and that flexibility is needed to meet the spirit of the law without compromising the health and wellbeing of the animals. It has been almost 50 years since the

passage of the Laboratory Animal Welfare Act, known to us now as the Animal Welfare Act, and more than 40 years since the passage of PHS *Policy*, and both have had many revisions. Have any revisions ever modified the requirement for the IACUC chairperson to assign DMR reviewers?

We feel it is time for the laws to recognize a role in addition to the institutional official, the attending veterinarian and the IACUC chairperson—that of the IACUC administrator. A half century ago, when the current laws and policies were being written, there was no such role; now, the Certified Professional IACUC Administrator is a recognized profession with certification through the national organization Public Responsibility in Medicine and Research. The IACUC administrator of an organization would be the individual best placed to provide assurance that the requirements of the laws are being met. An IACUC administrator is qualified to determine appropriate assignments using his or her knowledge of the regulations, institutional IACUC policies and the expertise of individual IACUC members. Recognizing and utilizing an IACUC administrator to his or her full potential would be a great benefit to our field. This scenario is just one example.

1. Animal Welfare Act Regulations. 7 U.S.C. 2131-2159. §2.31, d, 1, xi, 2.
2. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals IV, C, 2* (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).

Pohl is Research Compliance Monitor II/IACUC Administrator and Evans is Research Compliance Monitor I at UConn Health, Farmington, CT.