

them and preparing tissue samples of this species for shipping. Before the BeachFront IACUC approves this protocol, the IACUC's members should feel that Flatt is qualified to perform such procedures^{2,3}. As a consultant could benefit BeachFront University and ease its discomfort in assessing the scientific relevance of Gold's work, so also could a relevant expert provide consultation services to Great Eastern University so that members of the IACUC might benefit from understanding naked mole rats and their resistance to neoplasia. Lastly, BeachFront University need not serve as a "factory farm" for naked mole rat tissue. As Flatt's behavioral experiments come to their study endpoints, the proposed protocol can be written such that tissues would be donated to Gold only after Flatt's studies have reached their endpoint criteria.

The collaborative spirit of research should not be stifled by the apprehensions of either IACUC. In the long term, collaborations such as those proposed by Gold and Flatt serve to minimize the number of animals used by maximizing the use of animals and their associated tissues. Collaborative efforts between researchers and institutions lead to sharing that benefits both human and animal health.

1. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
2. United States Department of Agriculture. *Animal Welfare Inspection Guide* (US Department of Agriculture, Riverdale, MD, 2015).
3. Animal Welfare Act regulations. 9 CFR, Chapter I, Subchapter A, Part 2, Subpart C, Section 2.31(d)(1)(viii).

Shoulson is Chief of Quality Assurance and Training, and Echeverri, Herndon and Ordanes are Postdoctoral Fellows at the Institute of Comparative Medicine, Columbia University, New York, NY.

RESPONSE

Naked transparency in communication

Susan A. Iliff, DVM, DACLAM & Gina Savastano, RLAT, MA, PhD

The plans made by Flatt and Gold seem to be a reasonable potential inter-institutional collaboration. However, the researchers'

respective IACUCs seem hesitant to assume responsibility for oversight of the collaborative pilot study. As Flatt and the naked mole rat colony are located at BeachFront University, the BeachFront IACUC is responsible for reviewing the pilot study. It is worth noting that there is no federal requirement that both IACUCs carry out a dual review of protocols that include inter-institutional collaborations.

In this instance, the BeachFront and Great Eastern IACUCs would both benefit by maintaining transparency in their communications and recognizing the benefits of successful collaboration. Each scientist and institution has expertise in different areas, so members of the BeachFront IACUC could acknowledge their limited background in biomedical research and involve one or more consultants, as suggested in the Animal Welfare Act, "to assist in the review of complex issues arising out of its review of proposed activities"¹.

This consultant could be Gold, since he could explain his research on gene expression in cancer, the value of the proposed comparative study, and the number of animals that are needed to provide tissues for his *in vitro* study. This information would help to educate members of the BeachFront IACUC and possibly allay their concerns about breeding too many animals for Gold's study. In turn, Great Eastern IACUC could invite Flatt to serve as a consultant, as someone who is knowledgeable about the biology and behavior of the naked mole rat. Both IACUCs should be provided with the curricula vitae of the prospective collaborating scientists, along with biographies or supplemental information that explain their individual backgrounds and areas of expertise. If the collaborative protocol stipulates that other individuals besides Flatt would conduct *in vivo* procedures, then information on their background, skills and expertise should also be made available to the Great Eastern IACUC.

Straightforward sharing and exchange of information between IACUCs could provide the BeachFront IACUC with a sufficient level of comfort and understanding to approve the pilot study. However, a formal written document such as a memorandum of understanding could also be beneficial, if needed or desired². Such an agreement of understanding could address

and clarify each institution's respective responsibilities for animal ownership and animal care and use—including euthanasia and the collection, preparation and transportation of tissues—as well as IACUC review and oversight.

1. Animal Welfare Act regulations. 9 CFR, Chapter I, Subchapter A, Part 2, Subpart C, Section 2.31(d)(3)
2. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* 8th edn. (National Academies Press, Washington, DC, 2011).

Iliff is Principal Scientist at Merck Research Laboratories, Kenilworth, NJ, and Savastano is Associate Principal Scientist/IACUC coordinator at Merck Research Laboratories, Boston, MA.

RESPONSE

Roles and Responsibilities

Cory Goracke-Postle, PhD, CPIA

There might be an unrecognized opportunity for collaboration between the two IACUCs as they consider advancing a mutually advantageous research endeavor. As dual review is not required, only one IACUC is responsible for reviewing and approving the activity. It is customary that the IACUC at the institution where the work with live animals is taking place assumes the responsibility. Although this is not a required arrangement, and technically both institutions can use discretion as they arrange their review, in this particular case the proposed work at Great Eastern University does not fall under IACUC purview at all. Since the work under IACUC purview concerns euthanasia for the purpose of harvesting tissue, the burden of review should fall on the BeachFront IACUC. However, if members feel that they are insufficiently familiar with the topic, the BeachFront IACUC can always request external expertise to advise their consideration of the proposal. They could, in effect, request such a review from Great Eastern University and use that feedback in their review decision. While a Memorandum of Understanding might be needed to formalize this arrangement—since there seems to be some ambiguity among these institutions on the matter—one is not necessary from a regulatory perspective because Gold's work uses tissues *in vitro* and therefore does not