Jerald Silverman, DVM, Column Coordinator

Disagreement between IO and IACUC

During its most recent semiannual inspection, the Great Eastern University IACUC discovered—for the second time—that a satellite rabbit room cared for by a research laboratory had a very high temperature (88 °F) and no auxiliary ventilation. After discussion, the committee voted that this was a repeated significant deficiency that should be reported to the appropriate federal agencies. Michael McGregor, the new Institutional Official (IO) was informed of the committee's decision, the reason for it and the fact that the IACUC had given the school's regular animal care staff the authority to immediately move the animals to more appropriate housing. Being new to his position, McGregor initially thought nothing of the incident and verbally agreed with the IACUC. However, he quickly reversed his decision after the well-funded researcher responsible for the rabbits loudly complained about the horrid care his animals had previously received at the Great Eastern central animal facility and described the bad publicity for the school

that would result from any report to federal regulatory oversight agencies.

When Larry Covelli, the IACUC chairman, went to McGregor to voice his dissent about the reversed decision, McGregor downplayed the problem and suggested to him that a report would do more damage to the school's image and the researcher's ability to compete for grants than would any minor discomfort experienced by a small number of rabbits. Covelli answered that although there was no known long-term harm caused to the rabbits, covering up such a flagrant disregard for animal welfare and federal animal care standards was contrary to the charge of the IACUC and could lead to even more significant problems. Covelli's response was not what McGregor had expected. He stood up at his desk, rolled up his sleeves, puffed out his chest and calmly but firmly told Covelli that, in his opinion, the problems that the IACUC found were minor because no harm came to the animals, that the researcher's job was to do science and not to fix the heating system and that he had no intention of siding

with the IACUC. Rather, he told Covelli to spend whatever money was needed to fix the heat problem and then get on with approving protocols. Covelli tried to have some additional discourse but McGregor was not willing to do so.

Covelli related his meeting with McGregor to the IACUC. He said that he understood he was dealing with a new IO who was trying to gain favor with investigators and that McGregor had to learn more about his IO responsibilities. Nevertheless, he recommended sending a report to USDA/Animal Care and NIH/OLAW, even though the IO would not sign it. Not everybody was in agreement. Some felt that if the IO and the IACUC were not in agreement, a report could not be sent. Others were more pragmatic and said that because the goal was animal welfare, and not fights with the IO, now that they had funding to fix the problem, they should do that and let the disagreement become history.

What is your opinion? How would you resolve the problem facing Great Eastern University?

© 2012 Nature America, Inc. All rights reserved.

npj

RESPONSE

Do not pass go without the IO

Susan A. Iliff, DVM, DACLAM, CPIA & Pam Straeter, MS, RLATG

Covelli and McGregor are at an impasse. We feel the key to resolution of the disagreement is further communication between the IACUC, Institutional Official (IO) and Attending Veterinarian (AV). It is notable that the AV's involvement is absent in this scenario. The central focus in resolving the conflict should be the standard set forth in the Animal Welfare Act (AWA) governing the use of animals in research. The AWA defines whether a deficiency is significant or minor and addresses the reporting

obligations of organizations that use animals in research. The law defines a significant deficiency as one that "in the judgment of the IACUC and the Institutional Official, is or may be a threat to the health or safety of the animals" (§2.31c3)¹. The semiannual report should represent the IACUC's perspective on whether deficiencies are significant or minor and must include minority views. The regulation requires that the IACUC's report contain a plan and schedule for correction of each deficiency, whether significant or minor, and requires that a significant deficiency be promptly addressed and remedied.

An ambient temperature of 88 °F without auxiliary ventilation exceeds the threshold of 85 °F set as appropriate for animal health (§3.51b)^{1,2}. This deficiency, observed on more than one occasion, is significant. The most immediate solution would be moving the animals to appropriate housing. Using

available funds to modify the satellite room for appropriate animal housing is an option but does not provide prompt resolution of the problem.

It is unclear what, if any, action was taken when the significant deficiency was first identified during the inspection. If a reasonable and specific plan and schedule for correction of the previously identified deficiency was not followed, this should have been "reported in writing within 15 business days by the IACUC, through the Institutional Official, to APHIS [Animal and Plant Health Inspection Service] and any Federal agency funding that activity" (§2.31c3)¹. The IO's concern with the potential to damage the school's image is inappropriate and misplaced. The IO's role is to uphold the organization's commitment to animal welfare and animal well-being. The IO needs to understand the gravity