

4. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
5. Office of Laboratory Animal Welfare. Sample Animal Welfare Assurance. <http://grants.nih.gov/grants/olaw/sampledoc/assursmp.htm>.

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RESPONSE

Campus AVs plus an institutional veterinarian

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Adequate veterinary care is an essential and required part of every animal care and use program. The Animal Welfare Act regulations (AWARs)¹ define the Attending Veterinarian (AV) as a person “who has received training and/or experience in the care and management of the species being attended; and who has direct or delegated authority for activities involving animals at a facility subject to the jurisdiction of the secretary” (§1.1). Furthermore, the AWARs (§2.33, a) state that “each research facility shall have an attending veterinarian who shall provide adequate veterinary care to its animals.” Similarly, the Public Health Service *Policy on Humane Care and Use of Laboratory Animals*² (PHS Policy; IV, C, 1, e) requires the IACUC to assure that “medical care for animals will be available and provided as necessary by a qualified veterinarian.” The *Guide for the Care and Use of Laboratory Animals*³ (the *Guide*) states that the “attending veterinarian (i.e., a veterinarian who has direct or delegated authority) should give research personnel advice that ensures that humane needs are met and are compatible with scientific requirements.” Collectively, the AWARs, the *Guide* and the PHS Policy require that the attending veterinarian have the appropriate authority to oversee the adequacy of other aspects of animal care and use and also responsibility to develop and implement an effective program of veterinary care. The *Guide* describes components of an effective program of veterinary care to include preventive medicine; surveillance, diagnosis, treatment and control of disease;

A word from OLAW and USDA

In response to the issues raised in this scenario, the Office of Laboratory Animal Welfare (OLAW) and the United States Department of Agriculture, Animal and Plant Health Inspection Service, Animal Care (USDA/APHIS/AC) offer the following clarification and guidance:

The primary question posed in the scenario is whether federal regulations and policy permit an institution to have a single IACUC with an AV assigned to each of its different campuses or whether each institution is required to have a single IACUC and one AV to oversee all of its facilities and program areas.

Great Eastern could continue to have one IACUC and one AV, provided that communications with, and oversight of, the satellite campus veterinarians are clear and adequate. We also note, however, that federal regulations do not preclude institutions from having one IACUC and several AVs (one of whom must be a voting member of the IACUC).

A description of the duties and responsibilities of each veterinarian associated with the animal care and use program, and a statement regarding the direct or delegated authority of these individuals to implement the Public Health Service (PHS) Policy¹ and the provisions of the *Guide for the Care and Use of Laboratory Animals*², are required elements in Section III.B of the negotiated Animal Welfare Assurance³ for PHS-Assured institutions. An indication of the approximate percentage of time that those individuals will contribute to the program must also be included.

USDA and OLAW recognize that the size and complexity of institutions vary, and that no single organizational or administrative structure will be compatible with the needs of all institutions. While the Animal Welfare Act and regulations⁴ and the PHS Policy¹ allow for such institutional flexibility, it is strongly recommended that organizational channels for implementation be as direct and straightforward as possible⁵. Unclear or inappropriate lines of authority and responsibility have been the underlying cause for serious cases of programmatic failure.

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. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* (National Academies Press, Washington, DC, 1996).
3. Office of Laboratory Animal Welfare. Sample Animal Welfare Assurance, Section III.B. <http://grants.nih.gov/grants/olaw/sampledoc/assursmp.htm#sectionIII>.
4. Code of Federal Regulations, Title 9, Chapter 1, Subchapter A - Animal Welfare: Part 1 Definitions and Part 2 Regulations. §1.1, §2.31(b)(3)(i) and §2.33(a)(1-3).
5. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals – Frequently Asked Questions. Institutional Responsibilities, Question No. 4.* (US Department of Health and Human Services, Washington, DC, 2006; revised 2008). http://grants.nih.gov/grants/olaw/faqs.htm#instresp_4.

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management of protocol-associated disease or disability; anesthesia and analgesia; surgery and post-surgical care; assessment of well-being; and euthanasia. The specific items needed to provide adequate veterinary care will vary widely with the species housed within the research facility and the type of research being conducted using animal models. In summary, the AV must have the Doctor of Veterinary Medicine or equivalent degree with training or experience in

laboratory animal science or medicine and must have direct or delegated responsibility for activities involving animals at the research facility⁴. Research facilities should rely upon the advice of the AV to assure the proper care and use of animal models in accordance with all applicable federal, state and local regulations.

In the case of Great Eastern University, with the expansion of research programs from one campus to multiple campuses