

is no regulatory requirement for River Scientific to update the mouse program to be compliant with the 2010 version of the *Guide*.

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* 8th edn. (National Academies Press, Washington, DC, 2010).
3. Code of Federal Regulations. Title 9, Chapter 1, Subchapter A.

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RESPONSE

Shared authority and responsibility

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The staffing situation at River Scientific represents a classic power struggle that also presents a potential animal welfare concern. Crutch, the AV, and Wilensky, the animal facility manager, are both part-time employees. Wilensky is not only managing the facility but also caring for the mice, making him the ‘chief cook and bottle washer.’ In addition, the facility relies on part-time student help for weekend coverage. This staffing scenario may be common for start-up companies, but the overall objective of Crutch, Wilensky and the weekend animal care staff must be focused solely on animal care and use.

Because of his background in a university laboratory animal research setting, Crutch may have expectations that are not consistent with the resources of a small, financially limited biotech company. Despite the financial situation, the OLAW Assurance requires that River Scientific have the resources and trained individuals to carry out appropriate animal husbandry, as well as trained researchers and staff to carry out humane animal research (PHS *Policy* IV.C.1.d.)¹. The *Guide* indicates that an “effective Program requires clearly defined roles

that align responsibility with regulatory and management authority”². The IO has ultimate responsibility for the overall animal care and use program, and the AV must be provided with “sufficient” authority to manage the program of animal care. The *Guide* states that “the AV should oversee other aspects of animal care and use (e.g., husbandry and housing) to ensure that the Program complies with the *Guide*,” and in the case of a part-time AV, “there must be an individual with assigned responsibility for daily animal care and use and facility management”² and a means for frequent, direct and timely communication with the AV regarding any animal health issues (Animal Welfare Act; 9 CFR 2.33 (b))³.

It would be helpful if the regulations and guidelines included definitions of ‘authority’ and ‘responsibility’. Webster’s dictionary defines ‘authority’ as the power to control, command or determine, whereas ‘responsibility’ is defined as the state or act of being accountable, as for something within one’s power, involving duties or obligations⁴. Under the circumstances, however, imposing hierarchical positions on these two terms seems illogical. Because Crutch and Wilensky are part-timers, both must have the authority and responsibility to conduct their jobs. The responsibility and authority for ensuring that implementation of appropriate animal care and use (that meets River Scientific’s programmatic requirements) occurs on a daily basis reside with each member of the animal care staff, including Crutch and Wilensky.

Wilensky, with many years of experience as ‘chief cook and bottle washer’ is a valued employee of River Scientific, who, more than likely, has his own way of doing things. Unless his way of doing things is detrimental to animal health and welfare, the AV, as a new hire, should work with Wilensky and the weekend animal care staff to make sure that animal care and use is appropriate and a positive work environment is fostered. Although Crutch has the authority and responsibility to direct animal care and the animal facility, he is a part-time employee and must rely on others to implement the day-to-day husbandry requirements. The AV can also provide educational opportunities to increase Wilensky’s and the animal care staff’s

knowledge, awareness and understanding of current practices¹⁻³. Crutch should work with Wilensky, allowing Wilensky to do his job but still require accountability. Suckow and Doerning state, “when something must be done immediately and either the veterinarian or research personnel cannot be reached, it is best to have a policy to delegate authority and responsibilities”⁵. In this scenario, effective communication between Crutch and Wilensky is key. The approach should be one of shared authority, responsibility and accountability for the care and use of the laboratory animals at River Scientific.

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* 8th edn. (National Academies Press, Washington, DC, 2010).
3. Code of Federal Regulations. Title 9, Chapter 1, Subchapter A. Parts 1, 2, 3.
4. *Random House Webster’s Concise Dictionary* 2nd edn. (Random House, New York, 2001).
5. Suckow, M.A. & Doerning, B.J. Assessment of veterinary care. in *The IACUC Handbook* 2nd edn. (eds. Silverman, J., Suckow, M.A. & Murthy, S.) 493-520 (CRC Press, Boca Raton, FL, 2007).

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RESPONSE

AV has authority but colleagues need to collaborate

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Mice of the genus *Mus* that are bred for research are not covered by the provisions of the Animal Welfare Act¹, but because River Scientific receives funding from NIH, the PHS *Policy*² does apply. Section IV.A.3.b.1 of the PHS *Policy* states that the IACUC should include at least “one Doctor of Veterinary Medicine, with training or experience in laboratory animal science and medicine, who has direct or delegated program authority and responsibility

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