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RESPONSE

IACUC's responsibility

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There are essentially two different issues to be addressed in this situation: Steadman's research problem and Steadman's report of an animal welfare concern. Whereas it is not the IACUC's responsibility to uncover the problem with Steadman's research results, it is the responsibility of Great Eastern University and the IACUC to fully investigate all allegations of animal mistreatment or complaints regarding animal welfare. Therefore, it is the responsibility of the Great Eastern IACUC to fully review and investigate Steadman's complaint that the air conditioner's noise is adversely affecting the welfare of the laboratory rodents. In this instance, Steadman serves as the complainant. Once the complaint and appropriate background information are presented, it is up to the IACUC and not Steadman to determine whether animal welfare is indeed being adversely affected.

An IACUC's investigation into animal welfare complaints should include, at minimum, a review of all applicable references and resources. Because the university has AAALAC accreditation, the housing and care of all the rodents at Great Eastern, including those on Steadman's protocol, are subject to the standards put forth in the Guide for the Care and Use of Laboratory Animals¹, as well as the National Research Council's book Laboratory Animal Management: Rodents². The Guide clearly states that "the potential effects of equipment . . . that produce noise in the hearing range of nearby animals . . . should be carefully considered." In addition, the National Research Council's guide on

A word from AAALAC International

In response to the issues raised in this scenario, the Association for Assessment and Accreditation of Laboratory Animal Care International (AAALAC International) offers the following clarification and guidance:

The mission statement of AAALAC International notes that accreditation "enhances the quality of research, teaching, and testing by promoting humane, responsible animal care and use." AAALAC achieves this enhancement through a voluntary peer-review process that accredits an institution's program and not its "entire animal facility," as intimated in the first paragraph of the case study. This is not a trivial distinction; the enhancement of the quality of research through programmatic accreditation is not a certification that a, or any, particular facility in the institution's program will invariably be able to meet all of the environmental criteria that might be critical to the success of every sensitive scientific experiment involving animals. AAALAC's site visit evaluations surely encompass all facilities to ensure that they provide stable environmental conditions for the support of animal health and welfare and also appear to be controlling key environmental parameters that have the potential to confound scientific findings according to the recommendations of the Guide for the Care and Use of Laboratory Animals¹. Following the Guide, AAALAC International emphasizes the use of performance standards in its evaluation in lieu of highly detailed and narrowly defined engineering standards that might be relevant for particular research studies. Given this approach, it should not come as any surprise that the noise of an HVAC system would not have been found as "even a minor problem" by AAALAC. It is a bit surprising, however, that the IACUC regarded AAALAC's lack of negative comments about this facility among the reasons used to conclude that noise was an unlikely factor in Steadman's failed animal experiments. Perhaps in this case, the adverse performance outcome (i.e., experimental failure) should provide the impetus for the institution to reexamine and refine the performance standards for noise; the IACUC seems to have tepidly acknowledged this approach without the significant commitment of resources.

AAALAC International representatives would normally decline to enter the fray as to who should take the lead responsibility for analyzing and resolving the putative noise problem; the other discussants in this article have offered some thoughtful perspectives on this matter. It should be very clear, though, that as part of its programmatic review in reference to Chapter 2 of the *Guide*, AAALAC International site visitors would expect institutions to address issues of this nature in a professional and productive manner. Chapter 2 of the *Guide* states, "A strategy for achieving desired housing should be developed by animal-care personnel with review and approval by the IACUC. Decisions by the IACUC, in consultation with the investigator and veterinarian, should be aimed at achieving high standards for professional and husbandry practices considered appropriate for the health and well-being of the species and consistent with the research objectives. After the decision-making process, objective assessments should be made to substantiate the adequacy of animal environment, husbandry, and management."

 Institute for Laboratory Animal Research. Guide for the Care and Use of Laboratory Animals (National Academies Press, Washington, DC, 1996).

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laboratory management for rodents states that "an effort should be made to separate rodent-housing areas from ... areas where mechanical equipment is used" In light of the aforementioned guidelines, the Great Eastern IACUC should also

have, at minimum, interviewed animal care personnel and inspected the rodent housing areas. Dosimeters or other auditory measurement devices might also have been used to document the level of noise created by the air conditioner and support braces.