Institutions can achieve this oversight by following a performance-based approach, which can be efficient for both the IACUC and the investigator.

The AV cites ACLAM's 2004 Public Statement entitled *Medical Records for Animals Used in Research, Teaching, and Testing* as one of the documents outlining the necessity for medical records in this case. That paper states, "When medical records for such animals [rodents] are indicated, group records may be acceptable and may be more efficient than individual records[2]." In my opinion, here lies the compromise. An investigator can have group records maintained for each cohort undergoing surgery. Even if there are no postoperative problems, recorded entries can indicate date of observation and state, "No problems." Anyone can then easily review the record of these entries when necessary.

1. Health Extension Act of 1985. Public Law 99-158. Sec. 495 (20 November 1985).
2. American College of Laboratory Animal Medicine. Public Statements: Medical Records for Animals Used in Research, Teaching, and Testing.

*Kurtz is Attending Veterinarian, Experimental Pathology Laboratories, Inc., US Environmental Protection Agency, Research Triangle Park, NC.*

## RESPONSE

## Consider analgesia for all

**Michelle J. Keys, BS, RLATg**

There are several issues that need to be addressed with this scenario.

The first issue is Morrison's failure to maintain postoperative records. Although maintenance of postoperative records for rodents is not implicitly stated in the regulations, this investigator doesn't seem to be adhering to the spirit of the regulations. The scenario doesn't indicate whether this institution is PHS assured or AAALAC accredited. However, assuming that both of these are the case, the guidelines state the following:

"Procedures that may cause more than momentary or slight pain or distress to the animals will be performed with appropriate sedation, analgesia or anesthesia, unless the procedure is justified for scientific reasons in writing by the investigator[1]."

The *Guide* indicates that the veterinary care program, including surgery and postsurgical care, is the responsibility of the AV.

ACLAM's Public Statement on Adequate Veterinary Care assumes the position that "Adequate veterinary care includes responsibility for the promotion and monitoring of an animal's well-being before, during and after experimentation or testing. Animal well-being includes both physical and psychological aspects of an animal's condition evaluated in terms of environmental comfort, freedom from pain and distress, and appropriate social interactions, both with conspecifics and with man[2]."

It would be difficult, if not impossible, for the veterinary staff to determine whether animals are receiving appropriate postoperative care if there are no postoperative records for them to review.

The second issue is the use of postoperative analgesia on an 'as-needed' basis. The basis of 'evidence-based' pain amelioration is not consistent between species or members within that species. If the investigator is waiting to see evidence of pain before administering postoperative analgesia, then the animals may already be in extreme pain, especially if the species is a prey species. Even though this species isn't covered specifically under the AWA, the concept of pain relief should be consistent across animal species.

It appears that the Great Eastern IACUC could avoid this situation in the future by either implementing a policy that postoperative analgesia be given after all potentially painful procedures in rodents (as well as all other species, unless there is scientific justification for not doing so) or requiring that researchers provide the indices that will be used to determine the need to administer analgesia. Investigators should work with the veterinary staff to determine appropriate preoperative and postoperative analgesia that will benefit the animals while not adversely affecting study results. Records would then be necessary to confirm either the administration of postoperative analgesia or the monitoring that was used to determine that no analgesics were needed. Implementing this policy would benefit the animals at the institution and would ensure that researchers were advised of the IACUC expectations regarding animal care and documentation.

Whether this policy is implemented or not, it is still reasonable to require that the investigator maintain a group record for his rodents. Even the USDA recognizes this as a reasonable approach, provided that all of the animals in the group have had the same experimental manipulation. Thereafter, if a problem develops with any one of the animals, the expectation would be that an individual record be maintained for this animal documenting how the complication was handled.

Another approach to this concern is to encourage a more robust review by the IACUC. The Committee should learn from this situation and add this concern to its protocol review process, to assure that this concern does not happen again.

1. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* IV.C.1.b (US Department of Health and Human Services, Washington, DC, 1986).
2. American College of Laboratory Animal Medicine. Public Statements: Adequate Veterinary Care.

*Keys is Assistant Director, Office of Animal Welfare Assurance, Duke University, Durham, NC.*

## RESPONSE

## Proof is in the records

**Stephen I. Levin, DVM, PhD, ACLAM & Diana M. Palila Berger, DVM, MS**

Both the AV and the IACUC have the authority to compel Morrison to keep postoperative medical records. Although Morrison is correct in his assertion that the AWRs do not apply to his research and that the ACLAM 'white paper' is only a guideline, institutions that receive federal funding have the obligation of following the *Guide*, which states, "The [AV] must provide guidance or oversight to surgery programs and oversight of postsurgical care[1]." Furthermore, it is the IACUC's responsibility to "…oversee and evaluate the institution's animal program, procedures, and facilities to ensure that they are consistent with the recommendations in this *Guide*, the AWRs, and the PHS policy[1]." Many institutions also choose to apply the standards detailed in the AWRs, the *Guide*, and even ACLAM 'white papers' to all research involving vertebrate animals regardless of funding source. In doing so, the