

It is important for IACUCs to acknowledge the dynamic characteristic of the animal welfare regulatory landscape, in which each member may contribute to, especially in light of the *21<sup>st</sup> Century Cures Act*. IACUCs possess an inherent fluidity as well, given the varied generations of scientists, administrators, safety specialists, and community members that serve. The Great Eastern University IACUC

would benefit considerably by providing recurring, continuing education in the form of conferences and workshops (e.g., IAA Best Practices, IACUC 201/301, SCAW, etc.), enabling all members to refresh perspectives and share best practices.

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## IACUC SOPs

The Great Eastern University's IACUC was following its accepted practice of reviewing its SOP Manual to ensure compliance with federal regulations and their procedures to maintain the timeliness of these processes. The Merriam-Webster dictionary defines SOP as “established or prescribed methods to be followed routinely for the performance of designated operations or in designated situations”<sup>1</sup>. When Dr. Matthews presented what appeared to be a contradiction in one of these accepted practices, her due diligence was greeted by push back from the IACUC chairman. Her concerns seem reasonable. As is often the case, junior faculty and postdocs are reliant on their sponsor's monetary and lab support. If Dr. Matthews, as a member of the faculty, found the details of SOP III-42 not clear and explicit, her views deserve to be explored by the IACUC. A strong definition of the PI eligibility requirements is critical to the research enterprise. The fact that the IACUC—comprised of faculty

with the most to win or lose—was content with this “learning experience” and the ambiguity it provides is most concerning. I have reviewed several institutions' SOP requirements on PI eligibility<sup>2–4</sup>. They all are clear in their PI definitions. In my experience, the true goal of a SOP is to provide explicit instructions, with no room for individual interpretation. In fact, Great Eastern's IACUC is allowing individual interpretation of SOPs, which leaves them vulnerable from an oversight and compliance perspective. Any requirements by the IACUC for the protocol approval that involve the use of funds or resources that the PI doesn't have outright may result in a delay obtaining that approval. Worse yet, if it impacts animal health or well-being, that delay is more critical to providing continued humane care and use. Great Eastern's IACUC should use this as an opportunity to re-review their SOPs with a more critical eye. They can do this by surveying PIs and key stakeholders or by providing

focus groups, composed of different level academics, to discuss concerns or confusion regarding this SOP or any other. It is almost always better to fix a problem in house, than to try and fix it after it's brought to the institutional official's attention during a site visit.

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