primary standard for evaluating animal use programs⁴, the site visitors would also have been familiar with PHS Policy and cognizant of potential risks posed by practices or conditions that were external to a program that the PHS-supported activities were being conducted under. Point being—oversight of the llama study was performed by the

College of Agriculture (Ag College), which was not a component of the animal use program being evaluated by AAALAC.

The university's current policy allows some farm animals to be exempt from IACUC review and oversight based upon definitions provided under the Animal Welfare Act Regulations (AWARs; §1.1, Animal)

and the AWA (§2132.g). This was the basis for why the IACUC thought the llama study was outside its purview. But this wasn't an appropriate response since this attitude could inadvertently lead to a "not my job" type of culture that would lead to other incidences of unnoticed animal health issues. Ideally, and to avoid appearances of differential treatment of animals cared for within its animal use program, the University should institute a uniform policy of IACUC oversight that covers all animals, regardless of how it's used in research, testing, or teaching.

The site visitors insisting that Dr. Zymansky's llama work come under IACUC review was understandable from the perspective of wanting to establish uniform oversight within the program being evaluated for accreditation, which in turn promotes the minimization of animal pain and distress. But other discoveries during the site visit could have precipitated this request. E.g., the visitors may have felt that the llama-antibody work was biomedical in nature, eliminating the exemption the Ag College may have been claiming per certain definitions given in the AWA and its regulations. Or maybe the visitors learned that the antibody work received PHS-support, since it was stated that the BIV study was funded by federal government grants (plural). The BIV study directly involving dairy cows could certainly be considered agricultural in nature. The use of the llamas to produce the antibodies that support the dairy cow research seems biomedical in nature. There should be a written institutional policy to address such nuances—e.g., if the end goal of the use of an animal is to benefit another species, that research should be categorized as biomedical. □

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A WORD FROM AAALAC INTERNATIONAL

AAALAC International appreciates the opportunity to engage in this dialogue and to offer a response to this hypothetical scenario. As defined in our Mission Statement (<https://www.aalac.org/about/mission.cfm>), AAALAC International is a voluntary accrediting organization that enhances the quality of research, testing, and education by promoting humane and responsible research animal care and use through the provision of advice and independent assessments to participating institutions, and accreditation of those that meet or exceed applicable standards. Further, AAALAC works with institutions and researchers to serve as a bridge between scientific progress and animal well-being. This is done through AAALAC International's voluntary accreditation program in which institutions using animals in research, testing and education demonstrate that they meet the minimum standards required by law and are implementing global standards established by AAALAC to achieve excellence in animal care and use.

Each AAALAC International site visit is unique and may offer subtle variations in oversight, veterinary care, animal husbandry, occupational health and safety, etc., depending on the specific context of the animal care and use program. The written Program Description (<https://www.aalac.org/programdesc/index.cfm>) is designed to elicit responses that provide a comprehensive overview of the entire Program covered by the accreditation. AAALAC International encourages institutions to contact the AAALAC office with any questions regarding what Program components must be included in the accredited "unit" and consequently included in the Program Description. Fundamentally, AAALAC International uses institutional animal ownership to determine which animals are included in the application for, or renewal of, accreditation. All animals owned by the applicant or accredited unit must be

included in the Program Description for assessment by the AAALAC International site visit team. Animals that are not owned by the accredited unit, but are housed in the accredited program and may impact the health or welfare of the institutionally owned animals or the occupational health and safety of personnel, may be reviewed during the site visit. The scope of animal ownership may include animals housed in multiple sites or remotely (e.g., contract research organization, satellite facility, temporary housing). The concept of animal ownership is highlighted in an AAALAC "Frequently Asked Question" (https://www.aalac.org/accreditation/faq_landing.cfm#A1) and further communicated in an in-depth article on this particular subject (page 6), available for downloading from the AAALAC International Web site (https://www.aalac.org/publications/Connection/Spring_2003.pdf).

In the hypothetical example, the llama was under the purview and ownership of the College of Agriculture, and was not part of the accredited program (Colleges of Medicine and Veterinary Medicine). There was no indication the llama was in proximity to the animals that were part of the accredited program, which potentially would have had a negative impact on their welfare. The site visitors provided the barn manager with information that would allow subsequent follow-up with the veterinary staff to ensure the llama was appropriately examined/treated. This observation by the site visitors and communication with the barn manager is an example of the professional, collegial nature of AAALAC site visits that is intended to promote both animal welfare and high quality science. □

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