

testing, or teaching<sup>2</sup>.” Complementing this, animal use is defined as “the proper care, use, and humane treatment of laboratory animals produced for or used in research, testing, or teaching<sup>2</sup>.” As a combined result of these definitions, an IACUC protocol would be required to cover the teaching of basic agricultural animal management skills.

In this situation, US Government Principle IX is also particularly relevant<sup>1</sup>. It is the IACUC’s purview to decide on whether or not to require a protocol according to the Principle IX: “Where exceptions are required in relation to the provisions of these Principles, the decisions should not rest with the investigators directly concerned but should be made, with

due regard to Principle II, by an appropriate review group such as an institutional animal care and use committee. Such exceptions should not be made solely for the purposes of teaching or demonstration<sup>1</sup>.”

In conclusion, we advise the Great Eastern University IACUC to evaluate the scope of their PHS Assurance Letter. Based on what they find, they should (re) evaluate their stance on this matter. If their Assurance Letter includes the College of Agriculture, they should stand firm on requiring an IACUC protocol to cover the training. If their Assurance is not all-inclusive, they should either relax their requirements or rewrite their Assurance to include all animals on campus. □

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2. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals*. 8th edn (National Academies Press, Washington, DC, 2011).
3. United States Department of Agriculture. *Animal Care Policy Manual* (2016).

# Should the IACUC oversee teaching protocols using farm animals?

In this scenario Dr. Roger Gooding, a new faculty member at Great Eastern University, now teaches the course in animal handling and minor procedures in pigs and sheep. The instructor, Gooding, does not want to continue the process of submitting an IACUC protocol for the animals used in procedure training for students.

The question is raised as to whether an IACUC protocol is required for these activities. The Principal Investigator believes that he is not required to have an IACUC protocol or submit new techniques that he wishes to add to the course because his previous institution did not require IACUC

oversight. He also believes that the animals he is using are farm animals that do not fall within the Animal Welfare Act’s definition of animal because they are not used for biomedical research.

The Great Eastern University IACUC’s interpretation of the definition of animal is correct. The Animal Welfare Regulations (AWR) definition of animal includes any “warm-blooded animal, which is being used, or is intended for the use for research, teaching, testing, experimentation, or exhibition purposes, or as a pet, except farm animals such as livestock intended for use as food or fiber or intended for use

of improving animal nutrition, breeding, management, or production efficiency<sup>1</sup>”. It is not evident that Gooding’s course is meant to improve nutrition, breeding, production (or any additional conditions that exclude it from oversight) but it is clear that the animals are used for teaching, and therefore should be subject to IACUC oversight. The IACUC is also correct in that an approved protocol is required in this scenario because the AWR Part 2 subsection C requires the registration of any institution which is part of a school or department of a university or college, except if they can demonstrate to the Secretary that it is a separate legal entity<sup>2</sup>. This means that their PHS Assurance and USDA registration list all facilities using animals in any capacity as a research institution, thus requiring IACUC oversight<sup>3</sup>. This holds true despite of Gooding’s claim that the training animals are not directly funded by a research grant. □

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1. Animal Welfare Regulations Part 1 – Definition of Terms 7 U.S.C. 2131-2159; 7 CFR 2.22, 2.80, and 371.7.
2. Animal Welfare Regulations Part 2, Subsection C. § 2.30 - Registration.
3. U.S. Department of Health and Human Services. Public Health Service Policy on Humane Care and Use of Laboratory Animals (2015).

A WORD FROM USDA

The Animal Welfare Act’s (AWA) definition of “animal” excludes livestock used or intended for use as food or fiber, or intended for use for improving animal nutrition, breeding, management, or production efficiency<sup>1</sup>. The AWA regulations define “farm animal” to include pigs and sheep<sup>2</sup>. Here, the college is using the animals to train students in basic agricultural techniques such as hoof trimming and castration. The use of these animals in this manner excludes them from the definition of “animal” and AWA regulatory requirements for Institutional Animal Care and Use Committee (IACUC) oversight because the activities ultimately support the purposes of improving livestock nutrition, breeding, management/ production

and use as food/fiber. Although there are no applicable AWA regulatory requirements, the USDA supports the position that livestock used for educational purposes should be provided humane care. □

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1. 7 U.S.C. § 2132(g) - Animal
2. Title 9 Chapter 1 § 1.1 - Farm Animal