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## Multiple campuses, one IACUC: how many AVs?

As Great Eastern University expanded to multiple campuses, so did its research base. Initially, there was the main campus, with one, then two and eventually four buildings with animal facilities. Ten years later came the northern campus, some 50 miles from the main campus. In eight more years, the western campus opened, nearly 200 miles from the main campus. Finally, the eastern campus came into being, 100 miles from the main campus. When the northern campus opened, the Attending Veterinarian (AV) initially was able to oversee animal activities at both campuses, but eventually, the northern campus hired its own veterinarian. When the two other campuses opened, they immediately required separate on-site veterinarians, although the AV for all the campuses continued to work at the main campus. In addition to one AV, Great Eastern also had a single IACUC, NIH/OLAW Assurance, USDA registration and Institutional Official for all campuses. Monthly IACUC meetings were held at the main campus.

Although having but one IACUC and one AV helped to provide a degree of consistency in animal care and use across the campuses, it became apparent that having the AV stationed at the main campus was not conducive to the smooth running of the other animal facilities. Each facility's veterinarian had many responsibilities but not all of the authority needed to facilitate the animal facility's operations. The overall authority for activities involving animals at Great Eastern University was still held by the AV. Therefore, a decision was made by the university's administration to have an AV at each of Great Eastern's four campuses. This decision was questioned by some IACUC members because they believed that the wording of the Animal Welfare Act regulations (AWARs)<sup>1</sup>, the Public Health Service *Policy on Humane Care and Use of Laboratory Animals* (PHS Policy)<sup>2</sup> and the *Guide for the Care and Use of Laboratory Animals*<sup>3</sup> all implied that there could be only one AV at Great Eastern. The IACUC members added that the four campuses were overseen by one university president and

that there were certain university policies that affected all campuses. Taking all these factors together, they did not see anything allowing for more than one AV at Great Eastern. The chairperson of the IACUC said that the university administration would handle any issues that arose, but neither he nor the university's attorneys saw anything in the AWARs or the PHS Policy that prevented the university from having a separate AV at each campus.

What do you think? Can Great Eastern University have separate AVs at its different campuses, or do federal regulations and policy allow for just one AV at an institution having one IACUC and one Institutional Official?

1. Code of Federal Regulations, Title 9, Chapter 1, Subchapter A - Animal Welfare: Part 1 Definitions and Part 2 Regulations. §1.1, §2.31(b)(3)(i) and §2.33(a)(1-3).
2. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
3. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* (National Academies Press, Washington, DC, 1996).

### RESPONSE

#### Acting AVs

Joyce K. Cohen, VMD & Mark Sharpless, CMAR, CPIA

The issues facing Great Eastern University as a result of having multiple site locations are a common challenge: many universities and facilities that operate physically separate animal units face similar dilemmas. Decisions regarding the care and use of animals at each facility cannot become compromised or complicated by the absence of a veterinarian on-site that has authority and decision-making abilities.

Section 2.33 of the Animal Welfare Act regulations (AWARs)<sup>1</sup> states that each research facility shall hire or contract the services of

an Attending Veterinarian (AV). The AV's duties are stated to include responsibility for providing adequate veterinary care, authority to ensure that the veterinary care and animal care programs are appropriate and being a voting member of the facility IACUC. Appointing an AV at each satellite facility will allow for adequate veterinary care and appropriate authority at each location. However, section 2.31 states specifically that an IACUC cannot include more than three members from the same unit. This could be a factor in Great Eastern's decision to name AVs at each of its separate facilities. The University may have to be cautious with the titles they use and designate the central facility veterinarian as Chief AV in order to comply with the AWARs as well as with the Public Health Service *Policy on the Humane Care and Use of Laboratory Animals*<sup>2</sup>. This

Policy states that the delegated veterinarian should "be a doctor of veterinary medicine with appropriate training or experience in laboratory animal science and medicine and who has direct or delegated program authority and responsibility for activities involving animals at the institution."

The *Guide for the Care and Use of Laboratory Animals*<sup>3</sup> reiterates the duties of the AV as stated in the AWAR. Neither document specifically details that a facility must have a sole individual acting in the capacity of AV.

The individual filling the role of AV is designated by the Institutional Official and is charged with administrative oversight of the veterinary care program as well as the animal husbandry functions at all sites and facilities within the institution. The AV has the authority to allocate funds to ensure that

the facility remains in compliance with the pertinent laws and regulations. The most likely source of conflict in having multiple AVs revolves around appointing voting members to the IACUC. Institutions could consider appointing ‘acting’ AVs at each facility to bypass this conflict.

1. Animal Welfare Act and Animal Welfare Regulations.
2. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
3. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* (National Academies Press, Washington, DC, 1996).

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## RESPONSE

### Delegate authority

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The term ‘Attending Veterinarian’ (AV) is used in Animal Welfare Act (AWA)<sup>1</sup>, the Animal Welfare Regulations (AWRs)<sup>2</sup> and the *Guide for the Care and Use of Laboratory Animals* (the *Guide*)<sup>3</sup>. These publications do not specifically allow or disallow the use of more than one AV. The same is true of the Public Health Service *Policy on Humane Care and Use of Laboratory Animals* (PHS Policy)<sup>4</sup>. I see no obvious reason why there could not be more than one veterinarian acting as AV, since no publication specifically prohibits this arrangement. The question that comes to mind, however, is why veterinarians assigned to remote campuses at Great Eastern University did not have sufficient authority to facilitate operations at those sites.

The AWRs require each research facility to have an AV who is employed under formal arrangements to provide adequate veterinary care to its animals. The research facility must also assure that the AV has appropriate authority to ensure the provision of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use. The AV must be a voting member of the IACUC, provided, however, that a research facility with more than one Doctor of Veterinary Medicine (DVM) may appoint to the IACUC

another DVM with delegated program responsibility for activities involving animals at the research facility<sup>2</sup>.

The *Guide* describes the AV as a veterinarian who has direct or delegated authority and specifies that the AV is responsible for the veterinary care program. The *Guide* also states that the AWRs and PHS Policy require the AV to have the authority to oversee the adequacy of other aspects of animal care and use<sup>3</sup>.

While the PHS Policy does not use the term ‘AV’, the description of the veterinarian member of the IACUC is similar to that of the AV: a DVM, with training or experience in laboratory animal science and medicine, who has direct or delegated program authority and responsibility for activities involving animals at the institution. The PHS Policy also requires that Assured institutions base their programs of animal care and use on the *Guide* and that they comply with the applicable regulations (9 CFR, Subchapter A) issued by the USDA<sup>4</sup>.

The way in which Great Eastern University’s Animal Welfare Assurance describes the level of authority held by each individual veterinarian is important. The instructions for the PHS Sample Animal Welfare specifically require a description of the authority of the veterinarian(s) associated with the animal care and use program. “Authority: Dr. [name] has [direct or delegated] program authority and responsibility for the Institution’s animal care and use program.” If there is more than one veterinarian associated with the program, information is requested for each individual: “Responsibilities: [Describe authority and responsibilities]”<sup>5</sup>. The PHS thereby gives the institution the option to bestow authority on more than one veterinarian. My assumption is that such authority for veterinarians at remote campuses had not been provided for in Great Eastern’s Assurance. Great Eastern could modify its Assurance in a manner that would provide sufficient authority to these veterinarians.

The AWRs allow facilities to use the services of a part-time AV, which could be one approach to addressing Great Eastern University’s situation. In the case of a part-time or consulting AV, the formal arrangements must include a written program of veterinary care and regularly scheduled visits to the research facility. A mechanism of direct and frequent communication must be in place so that

timely and accurate information on problems of animal health, behavior and well-being is conveyed to the AV<sup>2</sup>. It is not clear whether an appropriate level of communication was taking place between the AV at Great Eastern University and veterinarians at remote sites, whether the AV made regular visits to remote campuses or whether the AV was available to travel to remote campuses whenever the need arose. Regardless, the local veterinarian would always be able to provide care in a timelier manner. The AWRs require that the AV be responsible for making a variety of decisions. Decisions directly related to health and welfare could require direct observation or examination of the animal in question. Examples might include excluding a dog from the exercise program after surgery, withholding enrichment from a nonhuman primate or removing an animal from water restriction because of dehydration. It is not clear what types of decisions the veterinarians at remote campuses were unable to make because of a lack of authority. If veterinarians’ lack of authority precluded timely veterinary care or intervention on behalf of the animals, it seems that this situation could impact animal welfare. It appears that even if the AV at Great Eastern University was serving in a part-time role at the remote campuses, similar to the situation described in the AWRs, he or she was not able to effectively manage the program remotely. Whether this situation was a result of poor communication, infrequent visits to remote campuses or some other reason is not clear.

The AWRs, the *Guide* and the PHS Policy all refer to delegated authority or responsibility in regard to veterinarian(s) associated with animal care and use programs<sup>2-4</sup>. Reference to delegated authority would seem to imply that the institution could provide all veterinarians with sufficient authority to effectively manage their campuses, without giving them the title of AV. Why the institution had not done so is not explained. I am inclined to consider that there may have been some underlying reason for not doing so, resulting in ineffective management of the program overall.

1. Animal Welfare Act as Amended (7 USC 2131-2159).
2. Animal Welfare Regulations (9 CFR, Chapter 1, Subchapter A—Animal Welfare Parts 1-4).
3. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* (National Academies Press, Washington, DC, 1996).

4. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
5. Office of Laboratory Animal Welfare. Sample Animal Welfare Assurance. <http://grants.nih.gov/grants/olaw/sampledoc/assursmp.htm>.

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## RESPONSE

### Campus AVs plus an institutional veterinarian

**Mahesh Jonnalagadda, BVSc, MS & Richard W. Ermel, DVM, MPVM, PhD, DACLAM**

Adequate veterinary care is an essential and required part of every animal care and use program. The Animal Welfare Act regulations (AWARs)<sup>1</sup> define the Attending Veterinarian (AV) as a person “who has received training and/or experience in the care and management of the species being attended; and who has direct or delegated authority for activities involving animals at a facility subject to the jurisdiction of the secretary” (§1.1). Furthermore, the AWARs (§2.33, a) state that “each research facility shall have an attending veterinarian who shall provide adequate veterinary care to its animals.” Similarly, the Public Health Service *Policy on Humane Care and Use of Laboratory Animals*<sup>2</sup> (PHS Policy; IV, C, 1, e) requires the IACUC to assure that “medical care for animals will be available and provided as necessary by a qualified veterinarian.” The *Guide for the Care and Use of Laboratory Animals*<sup>3</sup> (the *Guide*) states that the “attending veterinarian (i.e., a veterinarian who has direct or delegated authority) should give research personnel advice that ensures that humane needs are met and are compatible with scientific requirements.” Collectively, the AWARs, the *Guide* and the PHS Policy require that the attending veterinarian have the appropriate authority to oversee the adequacy of other aspects of animal care and use and also responsibility to develop and implement an effective program of veterinary care. The *Guide* describes components of an effective program of veterinary care to include preventive medicine; surveillance, diagnosis, treatment and control of disease;

## A word from OLAW and USDA

*In response to the issues raised in this scenario, the Office of Laboratory Animal Welfare (OLAW) and the United States Department of Agriculture, Animal and Plant Health Inspection Service, Animal Care (USDA/APHIS/AC) offer the following clarification and guidance:*

The primary question posed in the scenario is whether federal regulations and policy permit an institution to have a single IACUC with an AV assigned to each of its different campuses or whether each institution is required to have a single IACUC and one AV to oversee all of its facilities and program areas.

Great Eastern could continue to have one IACUC and one AV, provided that communications with, and oversight of, the satellite campus veterinarians are clear and adequate. We also note, however, that federal regulations do not preclude institutions from having one IACUC and several AVs (one of whom must be a voting member of the IACUC).

A description of the duties and responsibilities of each veterinarian associated with the animal care and use program, and a statement regarding the direct or delegated authority of these individuals to implement the Public Health Service (PHS) Policy<sup>1</sup> and the provisions of the *Guide for the Care and Use of Laboratory Animals*<sup>2</sup>, are required elements in Section III.B of the negotiated Animal Welfare Assurance<sup>3</sup> for PHS-Assured institutions. An indication of the approximate percentage of time that those individuals will contribute to the program must also be included.

USDA and OLAW recognize that the size and complexity of institutions vary, and that no single organizational or administrative structure will be compatible with the needs of all institutions. While the Animal Welfare Act and regulations<sup>4</sup> and the PHS Policy<sup>1</sup> allow for such institutional flexibility, it is strongly recommended that organizational channels for implementation be as direct and straightforward as possible<sup>5</sup>. Unclear or inappropriate lines of authority and responsibility have been the underlying cause for serious cases of programmatic failure.

1. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
2. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* (National Academies Press, Washington, DC, 1996).
3. Office of Laboratory Animal Welfare. Sample Animal Welfare Assurance, Section III.B. <http://grants.nih.gov/grants/olaw/sampledoc/assursmp.htm#sectionIII>.
4. Code of Federal Regulations, Title 9, Chapter 1, Subchapter A - Animal Welfare: Part 1 Definitions and Part 2 Regulations. §1.1, §2.31(b)(3)(i) and §2.33(a)(1-3).
5. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals – Frequently Asked Questions. Institutional Responsibilities, Question No. 4.* (US Department of Health and Human Services, Washington, DC, 2006; revised 2008). [http://grants.nih.gov/grants/olaw/faqs.htm#instresp\\_4](http://grants.nih.gov/grants/olaw/faqs.htm#instresp_4).

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management of protocol-associated disease or disability; anesthesia and analgesia; surgery and post-surgical care; assessment of well-being; and euthanasia. The specific items needed to provide adequate veterinary care will vary widely with the species housed within the research facility and the type of research being conducted using animal models. In summary, the AV must have the Doctor of Veterinary Medicine or equivalent degree with training or experience in

laboratory animal science or medicine and must have direct or delegated responsibility for activities involving animals at the research facility<sup>4</sup>. Research facilities should rely upon the advice of the AV to assure the proper care and use of animal models in accordance with all applicable federal, state and local regulations.

In the case of Great Eastern University, with the expansion of research programs from one campus to multiple campuses

(some campus sites 50–200 miles away from the main campus), the university administration made the decision that each campus should have an AV with delegated responsibility for activities involving animals at that research facility. While assigning AVs for each campus location, however, Great Eastern University would continue with a single IACUC, NIH/OLAW assurance, USDA registration and Institutional Official for all campuses. Thus, the question raised by some IACUC members centered on whether federal regulations and policy allow for an institution to have more than one AV.

Although the normal practice is to have one AV per institution, it is not unusual for a university to have multiple veterinarians involved with the institutional animal care and use program. Thus, the decision of Great Eastern University to assign veterinarians with direct or delegated program authority and responsibility for activities involving animals at the individual campus sites

is acceptable. These veterinarians are, in essence, AVs for the remote campuses. This approach helps to assure the necessary and mandated veterinarian oversight and guidance for animal care and use programs at each remote campus site. However, Great Eastern University still has an obligation to assign one AV as ‘institutional veterinarian’ for the entire university to provide for the health and well-being of animals throughout the entire institutional animal care and use program. In this situation (an AV for each campus and one institutional veterinarian for the university), it is imperative that the lines of accountability, authority and responsibility among the veterinarians be clear. Ideally, all the AVs should report to the institutional veterinarian at the main campus, who, in turn, should report to the Institutional Official.

In this approach, the institutional veterinarian at Great Eastern University will essentially delegate some responsibility

and authority to the on-site campus AVs to assure that the needs of the animals and research program are appropriately and adequately addressed. However, the ultimate responsibility for assuring proper animal care across the entire university setting will remain with the institutional veterinarian, the IACUC and the Institutional Official.

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1. Animal Welfare Act and Animal Welfare Regulations.
  2. Public Health Service. *Policy on Humane Care and Use of Laboratory Animals* (US Department of Health and Human Services, Washington, DC, 1986; amended 2002).
  3. Institute for Laboratory Animal Research. *Guide for the Care and Use of Laboratory Animals* (National Academies Press, Washington, DC, 1996).
  4. Silverman, J., Suckow, M.A. & Murthy, S. *The IACUC Handbook* 2nd edn. (CRC Press, Boca Raton, FL, 2007).

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