

UC Office of the President

Other

Title

UC Comments to AAALAC International's Proposed Revisions to Their Position Statement on "The Attending Veterinarian and Veterinary Care"

Permalink

<https://escholarship.org/uc/item/31h4n0qg>

Journal

N/A

Author

UC Office of the President

Publication Date

2024-06-07

We are submitting comments on behalf of the University of California (UC) system – comprised of ten campuses, six academic health centers, an Agriculture and Natural Resources division, and three affiliated U.S. Department of Energy national laboratories. We appreciate this opportunity to provide input to AAALAC International on their proposed revisions to the Position Statement on “The Attending Veterinarian and Veterinary Care.” UC supports most of AAALAC’s proposed revisions. We provide the following comments for your consideration.

1. The two following statements are deleted in the proposed revisions. UC recommends that these be retained:

- “The IACUC, in association with the Attending Veterinarian, has the responsibility for determining that personnel performing surgical procedures are appropriately qualified and trained in the procedures to be performed.”
- “The IACUC, in cooperation with the veterinarian, should be involved in classifying major versus minor surgical procedures.”

It is important that the AAALAC position statement address surgical procedures and reiterate that determining whether an individual is qualified and/or proficient to perform surgery is a shared responsibility between the IACUC and the veterinary staff. At UC, the Attending Veterinarian (AV) or their designee is often responsible for determining whether an animal user is appropriately trained and qualified to perform surgical procedures. As the institution’s subject matter experts on animal surgery, AVs are uniquely positioned and qualified to evaluate the training and competency of animal surgeons. AVs may receive input and assistance from the IACUC admin team and the PI/research team in determining the qualifications of personnel conducting surgeries in animals. UC is unaware of any other positions within an animal care and use program that would be equally qualified to make this determination.

Also note that other associations have nearly identical expectations.

- The Guide for the Care and Use of Laboratory Animals (“The Guide”) (pg. 116) states: “The IACUC, together with the AV, is responsible for determining that personnel performing surgical procedures are appropriately qualified and trained in the procedures (Anderson 2007),”
- The American College of Laboratory Animal Medicine’s (ACLAM) Position Statement on Adequate Veterinary Care states: “The institution bears responsibility and must assure, through authority explicitly delegated to the veterinarian or to the IACUC, that only facilities with programs appropriate for the intended surgical procedures are utilized and that personnel are adequately trained and competent to perform the procedures.”

2. UC is concerned with the proposed addition of following statement:

- “Provision of veterinary care should be documented in medical records in accordance with standards of veterinary practice and regulatory expectations.”

Since there is currently no agreed upon or legal definition of the phrase “standard of veterinary practice”, UC strongly objects to the addition of this language to the AV Position Statement. This phrase is not found in any of the current versions of the regulatory or guidance documents that IACUC’s adhere to, including The Guide, PHS Policy, Animal Welfare Act/Regulations, and ACLAM’s Position Statement

on Adequate Veterinary Care. UC recommends AAALAC avoid using the phrase “standard of veterinary practice” and instead state that veterinary care should be documented in medical records in accordance with regulatory expectations.

3. UC proposes that AAALAC consider adding the following points:

While the importance of regular AV communication with senior institutional administration about the animal care and use program is addressed, the need for establishing mechanisms of communication between animal users and veterinary staff is not. UC recommends that AAALAC include the following description in the list of important aspects of the veterinary role and program of veterinary care in the Position Statement:

“The AV requires a mechanism of direct and frequent communication with animal users and veterinary staff so that timely and accurate information on problems of animal health (including animal deaths), behavior, and well-being, as well as problems with facilities, equipment, and personnel, is conveyed to the AV.”

- AAALAC should also consider that part-time AVs need to have an established mechanism of communication with animal users, veterinary staff, the Institutional Official and other senior administrators, in the cases where there is no full-time AV on site. While the part-time AV should have input into the care and welfare of the animals, the ultimate responsibility and oversight should not be vested in the part-time AV.
- It would be helpful to have a definition of “animal husbandry” and a description of the AV’s involvement in animal husbandry oversight. This could be similar to the husbandry description in the Terrestrial Housing subsection of the Guide’s chapter on Environment, Housing, and Management, “Appropriate housing strategies [i.e., husbandry] for a particular species should be developed and implemented by the animal care management, in consultation with the animal user and veterinarian, and reviewed by the IACUC” (The Guide, pg. 52). This would help clarify that animal husbandry is a form of preventative veterinary medicine whose primary purpose is to keep animals healthy through appropriate housing, management, and care. According to the Guide’s chapter on Veterinary Care, “Effective preventive medicine enhances the research value of animals by maintaining healthy animals and minimizing nonprotocol sources of variation associated with disease and inapparent infection, thus minimizing animal waste and potential effects on well-being” (The Guide, pg. 109). A lack of AV involvement with husbandry-related decisions could be detrimental to animal health and well-being. UC recommends that AAALAC include the following definition and statement on animal husbandry:

“Animal husbandry is the proper housing, management, and care of breeding and non-breeding animals, by regulating environmental, housing, and other animal management impacts (including food and water) on animal health/welfare and research interference. Since husbandry is a vital and integral component of Veterinary Care, integrating components of preventative veterinary medicine and assessing for potential research interference, animal welfare impacts, etc., the AV must be consulted about the appropriate husbandry strategies and their implementation.”

Thank you for the opportunity to comment on the proposed revisions to AAALAC International’s Position Statement on “The Attending Veterinarian and Veterinary Care.” UC appreciates AAALAC’s continuing efforts to ensure the health and well-being of animals used for research and teaching. We look forward to continued engagement on this important issue.